

Bureau of Waste Prevention - Industrial Wastewater

BWP IW 38 & BWP IW 39

Permit for Industrial Sewer User

W204096	
Transmittal Number	
Facility ID# (if known)	_

01536

1f. Zip Code

2e. Zip Code

DEP Use Only

Important Instructions for Completing This Form

Date Received

Important:

forms on the

computer, use

use the return

key.

only the tab key to move your cursor - do not

When filling out

The questions on this form apply to existing and new facilities discharging industrial wastewater to sewers. If you are completing this form for an existing facility, answer the questions as they apply to its current status. If you are completing this form for a new facility, your answers will reflect your commitment to comply with the requirements as set forth in each question.

Existing facilities are defined as facilities in existence as of July 12, 2007. New facilities are defined as facilities constructed after July 12, 2007.

Answer all questions, except those that you are directed to skip. Please DO NOT answer questions that you are directed to skip

Permit Category (Select One)

- ☐ BWP IW 38: Industrial Sewer User in IPP POTW discharging more than 50,000 GPD
- ☑ BWP IW 39: Industrial Sewer User in Non-IPP POTW discharging more than 25,000 GPD

A. Facility Information

Tufts University Cummings School of Veterinary Medicine 1a. Facility Name 200 Westborough Road 1b. Facility Address 1 1c. Facility Address 2 North Grafton MA 1d. City 1e. State 508-839-7921 508-839-7980

1g. Phone Number 042-103-634

1i. Federal Employer Tax Identification Number (FEIN or TIN) Mailing Address: □ Check here if same as Facility Address and skip to Contact Information. 2a. Mailing Address: Street or P.O. Box 2b. Mailing Address 2

2c. City 2d. State

Contact Information: Joseph Chilton 3a. Contact Person Name Director of Facilities 3b. Contact Person Title 508-839-7921 N/A 3c. Phone Number 3d. Extension

1h. Fax Number

joseph.chilton-jr@tufts.edu

3e. Email Address



1.

Massachusetts Department of Environmental Protection Bureau of Waste Prevention – Industrial Wastewater

BWP IW 38 & BWP IW 39

Permit for Industrial Sewer User

W204096
Transmittal Number
Facility ID# (if known)

B. Industrial Wastewater Information

			•		
Project Description	(Check All That App	ly)			
☐ 1a. New Construction			☐ 1b. Permit Renewal		
☐ 1c. Increasing F	Flow From Existing Con	nection [1d. New or Modified Indust Pretreatment System (
	permitted Connection		r retreatment dystem (· · · · · · · · · · · · · · · · · · ·	
(Constructe	d Before 7/12/07)				
2 List in decom	ding order of cignifies	ance the Stands	ard Industrial Classification	(SIC) and as which	
best describe	the facility producing	the discharge in	terms of the principal prod	ducts or services	
provided. Also	o, specify each classi	fication title. (Se	ee Appendix B in the Instru	ictions)	
8221		Ĺ	Iniversity		
2a. SIC Code		,C	escription		
0742			eterinary Services		
2b. SIC Code			Description		
8733 2c. SIC Code			Non commercial Research Description		
8731			·		
2d. SIC Code			Commercial Physical & Biological Research Description		
3. List all sewer of	connection(s) and the	ir maximum dail	y flow(s) in gallons per day	(GPD) from vour	
	o the Publicly Owned				
	see attachment	see attachn	nent see attachment	3d. Total Flow,	
	<u>B-1</u>	<u>B-1</u>	<u>B-1</u>	All Connections	
SANITARY	CDD	CDD	CDD	- CDD	
	GPD	GPD	GPD	GPD	
INDUSTRIAL	GPD	GPD	GPD GPD	GPD	
	GID	01 0		010	
TOTAL	GPD	GPD	GPD	GPD	
	<u> </u>	<u> </u>	4. 5		
	í:				
4. Are you in com	ipliance with the Mas	sachusetts Histo	orical Commission requirer	ments?	
					
⊠ Yes			With Massachusetts Historica You Can Submit This Applica		
,	Require	ements before	Tou Carl Submit This Applica	uon.	
5. Are you in com	npliance with Massac	husetts Environi	mental Policy Act (MEPA)	requirements?	
Yes			With MEPA Requirements B	EFORE You Can	
	Submit	This Application.			



Bureau of Waste Prevention – Industrial Wastewater

BWP IW 38 & BWP IW 39

Permit for Industrial Sewer User

W204096	
Transmittal Number	
Facility ID# (if known)	

B. Industrial Wastewater Information (continued)

Check all pollutants that a treated, before discharge:		dustrial wastewater before p	pretreatment, or if not		
☐ 6a. Metals, Asbestos, Cyanide, Phenols					
If Metals, Asbestos, Cyanide (mg/L):	e, or Phenols are pre	esent, provide concentrations	s in milligrams per liter		
1. Antimony (total) (Sb)	mg/L	9. Nickel (total) (Ni)	mg/L		
2. Arsenic (total) (As)	mg/L	10. Selenium (total) (Se)	mg/L		
3. Beryllium (total) (Be)	mg/L	_ 11. Silver (total) (Ag)			
4. Cadmium (total) (Cd)		_ 12. Thallium (total) (TI)	mg/L 		
5. Chromium (hexavalent)	mg/L	_ 13. Zinc (total) (Zn)	mg/L 		
6. Chrome (total) (Cr)	mg/L	14. Asbestos	mg/L		
7. Copper (total) (Cu)	mg/L	15. Cyanide (total) (CN)	mg/L		
8. Lead (total) (Pb)	mg/L	16. Phenols (total)	mg/L		
mg/L mg/L Gb. Toxic Pollutants (See Section 17B in the Instructions.) If Toxic Pollutants are present, provide the total Toxic Pollutants concentration in micrograms per liter (ug/L):					
6b1. Total Toxic Pollutants Concen	tration (ug/L)	NOTE: Use the Toxic Pollut on toxic chemicals and their con			
	,				
☐ 6c. Total Petroleum Hydr	, ,	5 mg/L			
☐ 6d. pH <5 and >10 Stand	ard Units (S.U)				
⊠ 6e. Other*					
*If Other Pollutants are pres	ent, describe them:				
see Attachment B-2 for anal	ytical results				
·					



BWP IW 38 & BWP IW 39

Permit for Industrial Sewer User

W204096		
Transmittal Number		
Facility ID# (if known)		

В.	Industrial	Wastewater	Information ((continued))
----	------------	------------	---------------	-------------	---

Industrial Was	tewater Information	on (continued)			
7. Is Mercury (Hg) predischarge?	esent in your industrial was	tewater before pretreatment, or if not treated, before			
Yes	☐ Yes				
7a. If Yes, have you ideliminate the mercury	•	ury sources and taken all reasonable steps to			
☐ Yes*	□ No	*If Yes, skip to Question 8.			
7b. If No, explain why	<i>'</i> .				
NOTE: As of May 1, 2 Mercury.	2009, all facilities must me	et a discharge limit of 1 part per billion (ppb) for			
8. What is the name of the Publicly Owned Treatment Works (POTW) that receives your wastewater? (See Appendix C in the Instructions.)					
Grafton POTW Name of POTW	· 	-			
	rent sewer connection disc ee Section 17B in the Instr	harge permit or a current written approval issued by uctions.)			
⊠ Yes	□ No*	*If No, you must obtain either a permit or, if a permit is not required, a written approval from your local POTW to discharge BEFORE you can submit this application.			
If you have a permit,	If you have a permit, provide the following information, then skip to Question 10.				
9a. Permit Number	9b. Permit Expiration Date				
If you have a written a	approval, provide the follov	ving information:			
April 7, 2008 - See At 9c. Date of Approval Letter	_	David Therrien - Chairman 9d. Name of Person Who Signed the Letter			
10. Are your POTW a	and local Sewer Authority t	ne same entity? (See Section 17B in the Instructions.)			
⊠ Yes*	☐ Yes* ☐ No *If Yes, skip to Question 12.				



BWP IW 38 & BWP IW 39

Permit for Industrial Sewer User

W204096	
Transmittal Number	
Facility ID# (if known)	

B.	Industrial	Wastewater	Information	(continued)	

<u>B</u> .	Industrial	Wastewater Info	rmation (continued)			
	11. Do you have a current sewer connection discharge permit or a current written approval issued by your local Sewer Authority? (See Section 17B in the Instructions.)					
	Yes	□ No*	If No, you must obtain either a permit or written approval from your local Sewer Authority to discharge BEFORE you can submit this application.			
	If you have a p	permit, provide the following	ng information, then skip to Question 12.			
	11a. Permit Numb	per	11b. Permit Expiration Date			
	If you have a v	vritten approval, provide t	he following information:			
	11c. Date of Appro	oval Letter	11d. Name of Person Who Signed the Letter			
		ility currently classified as (See Appendix D in the Ir	a Categorical Industrial User (CIU) pursuant to Federal structions.)			
	☐ Yes	⊠ No*	*If No, skip to Section C.			
12a. List all the Categorical Pretreatment Standards applicable to your facility.						
	12a1. Part Number		Point Source Category			
	12a2. Part Number		Point Source Category			
	12a3. Part Numbe	er	Point Source Category			
	12a4. Part Numbe	er	Point Source Category			
C.	Industrial	Wastewater Pret	reatment System			
	1. Do you have wastewater?	e an on-site industrial was	stewater pretreatment system (IWPS) to treat your industrial			
	⊠ Yes	□ No*	*If No, skip to Section D.			
	1a. How many	IWPSs do you have?				
	3 Number		NOTE: If you have more than one IWPS, please use an Additional IWPS Form for each additional IWPS.			
(IV		unique identifier (i.e. name H neutralization system	e) for this IWPS:			



BWP IW 38 & BWP IW 39

W204096
Transmittal Number
Facility ID# (if known)

ermit for Indu	istrial Sewer User		Facility ID# (if known)
. Industrial	Wastewater Pre	treatment System (co	ontinued)
1c. What is the	Total Design Capacity of	of this IWPS?	•
21,600 (15 gpr Gallons Per Day	m) (see Attachment C-1)		
1d. What is the	e Average Daily Flow of t	his IPWS? (Estimate if this is	s a new facility.)
2,500 - estimate familiarity with	ted based on lab use and operations	d 	,
1e. What is the	e Maximum Daily Flow of	this IWPS? (Estimate if this	is a new facility.)
	sed on lab use and famil l. flows from IWPS-1B	iarity with	
		ted to meet all local discharg ards in 40 CFR Chapter I, Su	e standards and the applicable bchapter N?
⊠ Yes	□ No*	*If No, you must take compliance BEFORE	immediate steps to address the non- you can submit this application.
	VPS treat hazardous indo 14 CMR 7.02?	ustrial wastewater or hazardo	us industrial wastewater sludge
☐ Yes	⊠ No*	*If No, skip to Question	on 12.
3a. Are you tre	eating concentrated chen	nical baths, e.g. spent chemic	cal baths, or off-specification
☐ Yes	□ No*	*If No., skip to Question	on 4.
3b. If Yes, des	cribe the concentrated c	hemical baths you are treating	g.
	<u>.</u>		
4. Does your I' process" as de	WPS meet the requirement ofined in 310 CMR 30.01	ents of "treatment which is an 0?	integral part of the manufacturing
☐ Yes*	☐ No	*If Yes, skip to Quest	tion 7.
		astewater or hazardous indus duction processes, in tanks or	trial wastewater sludge that is containers?
located in a Drir	nking Water Zone (see Sect	ion 17C of the Instructions; refer	vater or sludge and your IWPS is rence language in 310 CMR 30.605), lust use form BWP IW 40 instead.

☐ Yes

☐ No*

*If No, skip to Question 7.



Bureau of Waste Prevention - Industrial Wastewater

BWP IW 38 & BWP IW 39

Permit for Industrial Sewer User

	_	

C.	. Industrial Wastewater Pretreatment System (continued)		
	6. Are you in compliance with the requirements for tanks and containers in 310 CMR 30.342 and 343? (See Section 17C in the Instructions)		
	Yes	□ No*	*If No, you must take immediate steps to address the non-compliance BEFORE you can submit this application.
	7. Do you have a U.S identification number		Agency (EPA) hazardous waste generator
	☐ Yes	□ No*	*If No, skip to Question 7b.
	7a. What is your EPA	A identification number?	
			Skip to Question 8.
	EPA ID#		
	7b. Explain why you	do not have an EPA identif	ication number.
			
	8. Do you have a vis	ible sign in place that warns	s against unauthorized entry into the IWPS area?
	☐ Yes*	□No	*If Yes, skip to Question 9.

9.Do you have the required spill containment for the IWPS?	(See Section 17C in the Instructions.)

☐ Yes* ☐ No *If Yes, skip to Question 10.

8a. Explain why you do not have a visible sign in place.

9a. Explain why you do not have the required spill containment.

10. Is your IWPS located on land subject to flooding from a 100-year storm? (See Section 17C in the Instructions.)

□ Vos	□ No*	*If No. skip to Ougstion 12
☐ Yes	□ NO	*If No, skip to Question 12



BWP IW 38 & BWP IW 39

Permit for Industrial Sewer User

W204096
Transmittal Number
Facility ID# (if known)

C.	Industrial Wastewater Pretreatment System (continued)				
	11. Are you in compliance with the flood-proofing provisions in 310 CMR 30.701(2)? (See Section 17C in the Instructions.)				
	☐Yes	□ No*	*If Yes, skip to Questio	n 12.	
	11a. Explain why you are not in compliance with the flood-proofing provisions in 310 CMR 30.70			ovisions in 310 CMR 30.701(2).	
	· .				
	12. What type of IWF	PS do you have? (Check al	I that apply.)		
	☐ Fully Automated Industrial Wastewater Pretreatment System (FAIWPS)				
	⊠ Continuous Disch	arge IWPS	☐ Batch IWPS		
13. Is the IWPS exempt from classification? (See Section 17C in the Instructions.)			nstructions.)		
☐ Yes* ☐ No *If Yes, skip to Question 14.		on 14.			
	13a. What is the classification of this IWPS? (See 257 CMR 2.13: Classification of Wastewater Treatment Facilities.)				
	⊠ Class 1I	☐ Class 2l		☐ Class 3I	
	☐ Class 4I	☐ Class 5 or 60		☐ Class 1M	
	☐ Class 2M	☐ Class 3M		☐ Class 4M	
	13b. How was the IWPS' classification determined?				
	☐ In accordance with the requirements in 314 CMR 7.05(2)(g) 4. c. or d.				
	☐ By the Board of Certification of Operators of Wastewater Treatment Facilities			nt Facilities	
	⊠ Both				
	14. Is the IWPS staff 17C in the Instructio		requirements of 314 C	MR 7.05(2)(g) 5? (See Section	
	⊠ Yes*	□ No	*If Yes, skip to Questic	on 15.	



BWP IW 38 & BWP IW 39

Permit for Industrial Sewer User

W204096

Industrial	Wastewater Pre	etreatment System (continued)	
14a. Explain why the IWPS is not staffed in accordance with 314 CMR 7.05(2)(g) 5.			
N/A			
TO/FA			
	this application a reques	under Permit Category BWP IW 38 or BWP IW 39 for this st for modification of this IWPS that currently has a BWP IW	
⊠ Yes*	□ No	*If Yes, you need to submit as an attachment the proce flow diagram and description of the principal treatment processes for your IWPS. Otherwise, skip to Question	
16. How many	attachments are include	ed with this application in response to Question 15?	
1 - see attachr	ment C-2		
Number of Attach			
		WPS been designed and constructed in compliance with the set forth in 314 CMR 7.05(2)(g)3?	
	□ No*	*If No, skip to Question 17b,	
17a. What is the engineering pl		stered Professional Engineer (MAPE) signature date on the	
10-14-87		Skip to Question 18.	
Date		 _ ' '	
		on and IWPS have not been designed and constructed in ruction standards as set forth in 314 CMR 7.05(2)(g)3.	
		about the Massachusetts Registered Professional Engineer signed your engineering plans:	
A. Eugene Su	llivan	617-523-8227	
18a. Name		18b. Phone Number	
9177		Sanitary	
18c. Mass. P.E. L	icense Number	18d. Mass. P.E. Specialty	



BWP IW 38 & BWP IW 39 Permit for Industrial Sewer User

W204096	
Transmittal Number	
E 32 ID# (C)	
Facility ID# (if known)	

atment System (continued) aintenance manual that complies with the procedures and ? *If Yes, skip to Question 20. red IWPS operation and maintenance manual. and maintenance manual current? tion and maintenance manual? cordkeeping sewer discharge permit(s), IWPS plan(s), and current
*If Yes, skip to Question 20. red IWPS operation and maintenance manual. Ind maintenance manual current? tion and maintenance manual? Drdkeeping sewer discharge permit(s), IWPS plan(s), and current
red IWPS operation and maintenance manual. Ind maintenance manual current? Ition and maintenance manual? Indicate the property of the prope
nd maintenance manual current? tion and maintenance manual? ordkeeping sewer discharge permit(s), IWPS plan(s), and current
tion and maintenance manual? ordkeeping sewer discharge permit(s), IWPS plan(s), and current
tion and maintenance manual? ordkeeping sewer discharge permit(s), IWPS plan(s), and current
tion and maintenance manual? ordkeeping sewer discharge permit(s), IWPS plan(s), and current
ordkeeping sewer discharge permit(s), IWPS plan(s), and current
ordkeeping sewer discharge permit(s), IWPS plan(s), and current
sewer discharge permit(s), IWPS plan(s), and current
sewer discharge permit(s), IWPS plan(s), and current
pplicable) on-site at all times?
* If Yes, skip to Question 2.
records on-site at all times.
s including your wastewater monitoring and analyses is and logs, bills of lading, summary reports of all incidents and hazardous waste manifests (as applicable) on-site for
* If Yes, skip to Question 3.
records on-site for at least three years.



Bureau of Waste Prevention - Industrial Wastewater

Additional IWPS Form Use With BWP IW 38 & BWP IW 39

W204096
Transmittal Number
Facility ID# (if known)
Permit Code

Instructions: Submit a completed copy of this form for each additional Industrial Wastewater Pretreatment System (IWPS) not identified on your BWP IW 38/BWP IW 39 permit application.

Industrial Wastewater Pretreatment System (IWPS) Information

NOTE: Question numbers on this form are identical with those on the BWP IW 38/BWP IW 39 permit application or Industrial Sewer Connection Certification forms. Questions 1 and 1a have been intentionally omitted.

•	a unique identifier (i.e. name utralization system (IWPS-2	
	I Design Capacity of this IW	
14,400 (see Attachn Gallons Per Day	nent C-1)	_
1d. What is the Ave	rage Daily Flow of this IPW	S? (Estimate if this is a new facility.)
1,000 - estimated or operations	n lab use and familiarity with	1 —
1e. What is the Max	imum Daily Flow of this IW	PS? (Estimate if this is a new facility.)
2,000 - estimated of operations	n lab use and familiarity wit	h —
		eet all local discharge standards and the applicable 0 CFR Chapter I, Subchapter N?
⊠ Yes	□ No*	*If No, you must take immediate steps to address the non-compliance BEFORE you can submit this application.
3. Does this IWPS t as defined in 314 C		astewater or hazardous industrial wastewater sludge
☐Yes	⊠ No*	*If No, skip to Question 12.
3a. Are you treating products?	concentrated chemical bat	hs, e.g. spent chemical baths, or off-specification
☐Yes	□ No*	*If No, skip to Question 4.
3b. If Yes, describe	the concentrated chemical	baths you are treating:
		·



Additional IWPS Form Use With BWP IW 38 & BWP IW 39

W204096
Transmittal Number
Facility ID# (if known)
Permit Code

IWPS Inform	nation	(continued)
-------------	--------	-------------

VPS Information	n (continued)	
4. Does your IWPS n process" as defined i		reatment which is an integral part of the manufacturing
☐ Yes*	□No	*If Yes, skip to Question 7.
		r or hazardous industrial wastewater sludge that is rocesses and stored in tanks or containers?
located in a Drinking W	ater Zone (see Section 17C of	rdous industrial wastewater or sludge and your IWPS is of the Instructions; reference language in 310 CMR 30.605), P IW 39 permit. You must use form BWP IW 40 instead.
☐ Yes	□ No*	*If No, skip to Question 7.
	ance with the requirements 7C in the Instructions)	for tanks and containers in 310 CMR 30.342 and
☐Yes	□ No*	*If No, you must take immediate steps to address the non-compliance BEFORE you can submit this application.
7. Do you have a U.S identification number		n Agency (EPA) hazardous waste generator
☐ Yes	□ No*	*If No, skip to Question 7b.
7a. What is your EPA	A identification number?	
		Skip to Question 8.
EPA ID # 7b. Explain why you	do not have an EPA identi	fication number.
8. Do you have a vis	ible sign in place that warn	s against unauthorized entry into the IWPS area?
☐ Yes*	□No	*If Yes, skip to Question 9.
8a. Explain why you	do not have a visible sign	in place.



Additional IWPS Form Use With BWP IW 38 & BWP IW 39

W204096
Transmittal Number
Facility ID# (if known)
Permit Code

Additional IWPS Information (continued)

9.Do you have the re	equired spill containment fo	r the IWPS? (See Section 17C in the Instructions.)
☐ Yes*	□No	*If Yes, skip to Question 10.
9a. Explain why you	do not have the required sp	pill containment.
•		
_		
10. Is your IWPS loc	ated on land subject to floo	ding from a 100-year storm? (See Section 17C in th
☐Yes	□ No*	*If No, skip to Question 12.
11. Are you in comp		g provisions in 310 CMR 30.701(2)? (See Section
☐ Yes*	□ No	*If Yes, skip to Question 12.
11a. Explain why yo	u are not in compliance with	n the flood-proofing provisions in 310 CMR 30.701(2)
12. What type of IW	PS do you have? (Check al	I that apply.)
☐ Fully Automated	Industrial Wastewater Pretr	eatment System (FAIWPS)
☑ Continuous Discharge IWPS		☐ Batch IWPS
13. Is the IWPS exe	mpt from classification? (Se	ee Section 17C in the Instructions.)
☐ Yes*	⊠ No	*If Yes, skip to Question 14.
13a. What is the cla Treatment Facilities.	-	ee 257 CMR 2.13: Classification of Wastewater
⊠ Class 1I	☐ Class 2I	☐ Class 3I
☐ Class 4I	☐ Class 5 or 60	☐ Class 1M
☐ Class 2M	☐ Class 3M ☐ Class 4M	



Additional IWPS Form Use With BWP IW 38 & BWP IW 39

W204096	
Transmittal Number	
Facility ID# (if known)	_
Permit Code	

Additional IWPS Information (continued)

13b. How was	the IWPS' classification	n determined?
☐ 13b1. In acc	ordance with the requi	rements in 314 CMR 7.05(2)(g) 4. c. or d.
☐ 13b2. By the	Board of Certification	of Operators of Wastewater Treatment Facilities
14. Is the IWPS		e with the requirements of 314 CMR 7.05(2)(g) 5? (See Section
⊠ Yes*	□No	*If Yes, skip to Question 15.
14a. Explain w	hy the IWPS is not staf	ffed in accordance with 314 CMR 7.05(2)(g) 5.
	this application a reque	under Permit Category BWP IW 38 or BWP IW 39 for the est for modification of the IWPS that currently has a BWP IW 38
⊠ Yes*	□No	*If Yes, you need to submit as an attachment the process flow diagram and description of the principal treatment processes for your IWPS.
16. How many	attachments are include	ded with this application in response to Question 15?
2 - See Attachr Number of Attachr	ments C-2 & C-3	
		IWPS been designed and constructed in compliance with the set forth in 314 CMR 7.05(2)(g)3?
⊠ Yes	□ No*	*If No, skip to Question 17b.
17a. What is the engineering pla	_	istered Professional Engineer (MAPE) signature date on the
2-14-95		Skip to Question 18.
Date		



Additional IWPS Form Use With BWP IW 38 & BWP IW 39

W204096	
Transmittal Number	
Facility ID# (if known)	_
Permit Code	

17b. Explain why your sewer connection and IWPS have not been designed and constructed in compliance with the design and construction standards as set forth in 314 CMR 7.05(2)(g)3.			
	e name of the Massachus signed your engineering	setts Registered Professional Engineer (MAPE) who reviewed plans:	
Aldo Ruggieri		N/A	
18a. Name		18b. Phone Number	
35537		Plumbing	
18c. Mass. P.E. L	icense Number	18d. Mass. P.E. Specialty	
other requiren ☑ Yes*	nents in 314 CMR 7.05(2) ☐ No	Id maintenance manual that complies with the procedures and (g)6.? *If Yes, skip to Question 20. WPS operation and maintenance manual.	
20. Are you ke	eeping your IWPS operati	ion and maintenance manual current?	
⊠Yes	□ No		
21. Are you in	nplementing your IWPS o	peration and maintenance plan manual?	
⊠ Yes	□ No		



Bureau of Waste Prevention - Industrial Wastewater

Additional IWPS Form Use With BWP IW 38 & BWP IW 39

W204096
Transmittal Number
Facility ID# (if known)
Permit Code

Instructions: Submit a completed copy of this form for each additional Industrial Wastewater Pretreatment System (IWPS) not identified on your BWP IW 38/BWP IW 39 permit application.

Industrial Wastewater Pretreatment System (IWPS) Information

NOTE: Question	n numbers on this form ar	re identical with those on the BWP IW 38/BWP IW 39 permit application
or Industrial Sev	ver Connection Certificati	on forms. Questions 1 and 1a have been intentionally omitted.
1b. Please pro	vide a unique identifier	r (i.e. name) for this IWPS:
Building 20 - D	isinfection System (IW	/PS-1B)
1c. What is the	Total Design Capacity	y of this IWPS?
3,840 (see Atta Gallons Per Day	achment C-1)	
1d. What is the	e Average Daily Flow o	of this IPWS? (Estimate if this is a new facility.)
1,000 - estima	ted based on lab use a operations	and
1e. What is the	Maximum Daily Flow	of this IWPS? (Estimate if this is a new facility.)
2,000 - estimate familiarity with	ted based on lab use a operations	and
		ucted to meet all local discharge standards and the applicable ndards in 40 CFR Chapter I, Subchapter N?
⊠ Yes	□ No*	*If No, you must take immediate steps to address the non- compliance BEFORE you can submit this application.
	/PS treat hazardous in 14 CMR 7.02?	dustrial wastewater or hazardous industrial wastewater sludge
⊠ Yes	□ No*	*If No, skip to Question 12.
3a. Are you tre	eating concentrated che	emical baths, e.g. spent chemical baths, or off-specification
☐ Yes	⊠ No*	*If No, skip to Question 4.
3b. If Yes, des	cribe the concentrated	chemical baths you are treating:



Additional IWPS Form Use With BWP IW 38 & BWP IW 39

W204096
Transmittal Number
Facility ID# (if known)
Permit Code

IWPS Information (continued)

VP 3 IIIIOI IIIatio	rr (continuea)	
4. Does your IWPS n process" as defined i		reatment which is an integral part of the manufacturing
⊠ Yes*	□ No	*If Yes, skip to Question 7.
		r or hazardous industrial wastewater sludge that is rocesses and stored in tanks or containers?
located in a Drinking W	ater Zone (see Section 17C o	rdous industrial wastewater or sludge and your IWPS is of the Instructions; reference language in 310 CMR 30.605), P IW 39 permit. You must use form BWP IW 40 instead.
☐ Yes	□ No*	*If No, skip to Question 7.
	ance with the requirements 7C in the Instructions)	for tanks and containers in 310 CMR 30.342 and
☐ Yes	□ No*	*If No, you must take immediate steps to address the non-compliance BEFORE you can submit this application.
7. Do you have a U.S identification number		n Agency (EPA) hazardous waste generator
⊠ Yes	□ No*	*If No, skip to Question 7b.
7a. What is your EPA	A identification number?	
MAD991304718 EPA ID #		Skip to Question 8.
	do not have an EPA identit	fication number
76. Explain Wily you	do not have an El Aldentil	neator number.
8. Do you have a vis	ible sign in place that warn	s against unauthorized entry into the IWPS area?
⊠ Yes*	□No	*If Yes, skip to Question 9.
8a. Explain why you	do not have a visible sign i	in place.



Additional IWPS Form Use With BWP IW 38 & BWP IW 39

ımher	
illipei	
known)	
,	
	umber known)

Additional IWPS Information (continued)

9.Do you have the re	quired spill containment fo	r the IWPS? (See Section 17C in the Instructions.))
⊠ Yes*	□ No	*If Yes, skip to Question 10.	
9a. Explain why you	do not have the required s	pill containment.	
10. Is your IWPS local Instructions.)	ated on land subject to floo	ding from a 100-year storm? (See Section 17C in	the
☐ Yes	⊠ No*	*If No, skip to Question 12.	
11. Are you in compli 17C in the Instruction		ng provisions in 310 CMR 30.701(2)? (See Section	
☐ Yes*	□No	*If Yes, skip to Question 12.	
11a. Explain why you	u are not in compliance wit	n the flood-proofing provisions in 310 CMR 30.701(2).
12. What type of IWF	PS do you have? (Check al	I that apply.)	
□ Fully Automated I	ndustrial Wastewater Pretr	eatment System (FAIWPS)	
☐ Continuous Disch	arge IWPS	☐ Batch IWPS	
12 In the IMPS aren	ant from plansification? (Co	on Continue 170 in the Instructions	
		ee Section 17C in the Instructions.)	
☐ Yes*	⊠ No	*If Yes, skip to Question 14.	
13a. What is the clas Treatment Facilities.)		ee 257 CMR 2.13: Classification of Wastewater	
⊠ Class 1I	☐ Class 2I	☐ Class 3I	
☐ Class 4I	☐ Class 5 or 60	☐ Class 1M	
☐ Class 2M	☐ Class 3M	☐ Class 4M	



Additional IWPS Form Use With BWP IW 38 & BWP IW 39

W204096
Transmittal Number
Facility ID# (if known)
Permit Code

Additional IWPS Information (continued)

13b. How was the IV	VPS' classification determin	ned?
☐ 13b1. In accordar	nce with the requirements in	n 314 CMR 7.05(2)(g) 4. c. or d.
☐ 13b2. By the Boa	rd of Certification of Operat	ors of Wastewater Treatment Facilities
☑ 13b3. Both		
14. Is the IWPS staf 17C in the Instructio		requirements of 314 CMR 7.05(2)(g) 5? (See Section
⊠ Yes*	□ No	*If Yes, skip to Question 15.
14a. Explain why the	e IWPS is not staffed in acc	ordance with 314 CMR 7.05(2)(g) 5.
	pplication a request for mod	rmit Category BWP IW 38 or BWP IW 39 for the dification of the IWPS that currently has a BWP IW 38
⊠ Yes*	□ No	*If Yes, you need to submit as an attachment the process flow diagram and description of the principal treatment processes for your IWPS.
16. How many attac	hments are included with th	nis application in response to Question 15?
2 - See Attachments Number of Attachments	s C-4 & C-5	_
	r connection and IWPS bee ction standards as set forth i	en designed and constructed in compliance with the in 314 CMR 7.05(2)(g)3?
⊠ Yes	□ No*	*If No, skip to Question 17b.
17a. What is the Ma engineering plans?	ssachusetts Registered Pro	ofessional Engineer (MAPE) signature date on the
6/23/03 Date		Skip to Question 18.



Additional IWPS Form Use With BWP IW 38 & BWP IW 39

W204096
Transmittal Number
Facility ID# (if known)
Permit Code

		n and IWPS have not been designed and constructed in action standards as set forth in 314 CMR 7.05(2)(g)3.
	e name of the Massachus signed your engineering	setts Registered Professional Engineer (MAPE) who reviewed plans:
Alfred Melchio	nda	781-372-3000
18a. Name		18b. Phone Number
34857		Plumbing
18c. Mass. P.E. L	icense Number	18d. Mass. P.E. Specialty
⊠ Yes*	nents in 314 CMR 7.05(2) ☐ No	*If Yes, skip to Question 20.
19a. Explain v	vhy you do not have an I\	WPS operation and maintenance manual.
20. Are you ke	eeping your IWPS operat	ion and maintenance manual current?
⊠ Yes	□ No	
21. Are you im	nplementing your IWPS o	pperation and maintenance plan manual?
⊠ Yes	□No	



Bureau of Waste Prevention - Industrial Wastewater

BWP IW 38 & BWP IW 39

Permit for Industrial Sewer User

Transmittal Number	
Facility ID# (if known)	

MOUVOR

D. Monitoring, Reporting & Recordkeeping (continued)

3. [Reserved for Toxics Reporting]

Additional reporting requirements will be added to this section in the future.

Ε.	General	&	Specific	Proh	ibitions
	- 0110101	\sim	OPOULLY	, , , , , ,	

1. After carefully reviewing all of the general and specific prohibitions listed below, are you in compliance with these General and Specific Prohibitions?				
⊠ Yes*	□ No	*If Yes, read Section F and then complete Section G.		
•	the prohibitions you are to this form, if necessa	e not in compliance with and explain why. Attach an additional ary.		

- 1. General Prohibitions. The permittee shall not:
 - a. Discharge, or cause to be discharged to a POTW, any substances, materials, or wastewater that may:
 - i. harm the sewers, POTW wastewater treatment process or equipment;
 - ii. have an adverse impact on the receiving waters; or
 - iii. otherwise create a nuisance or endanger public health, safety, or the environment.
 - b. Introduce pollutants into POTWs that pass through the POTW or interfere with its operation or performance.
 - c. Discharge wastewater or allow discharge of wastewater through any sewer connection that would result in a hazard to the public health or safety.
 - d. Discharge bypass wastewater or allow discharge of bypass wastewater through any sewer connection. If bypassing due to an emergency condition occurs, the Department and POTW shall be notified in accordance with 314 CMR 7.04(3). Such notification or its acknowledgement shall not be construed as permission by the Department or POTW to discharge bypass wastewater.
 - e. Discharge hazardous waste or allow the discharge of hazardous waste through any sewer connection.
- **2. Specific Prohibitions.** The permittee shall not introduce into a POTW or its wastewater collection system the following:
 - a. Pollutants which may create a fire, explosion, or other hazard in the POTW or its wastewater collection system.
 - b. Pollutants which may cause corrosive structural damage to the POTW or its wastewater collection system. In no case shall discharges with a pH lower than 5.0 Standard Unit (S.U) or more than 10.0 S.U. be allowed, unless the local limit allows such discharges.
 - c. Solid or viscous pollutants in amounts which may cause obstruction to the flow in the POTW or its wastewater collection system or may result in interference.
 - d. Any pollutant, including oxygen-demanding pollutants, discharged at a flow rate or pollutant concentration that will cause interference with the POTW or its wastewater collection system.
 - e. Heat in amounts which may inhibit biological activity in the POTW, resulting in interference. In no case shall heat in such quantities that the temperature at the POTW treatment plant exceeds 40° C (104° F) be discharged, unless the Department, upon request of the POTW, approves alternate temperature limits.



Bureau of Waste Prevention - Industrial Wastewater

BWP IW 38 & BWP IW 39

Permit for Industrial Sewer User

Transmittal Number	

Facility ID# (if known)

W204096

F. Additional Conditions

- a. All discharges shall be in compliance with the terms and conditions of this permit. The discharge of any wastewater at a level in excess of that identified and authorized by this permit shall constitute a violation of the terms and conditions of this permit. Such a violation may result in the imposition of civil and/or criminal penalties as provided for in M.G.L. c.21, Section 42.
- b. After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to, the following:
 - i. Violation of any terms or conditions of the permit;
 - ii. Obtaining a permit by misrepresentation or failure to disclose fully all relevant facts; or
 - iii. A change in conditions or the existence of a condition, which requires either a temporary or permanent reduction, or elimination of the authorized discharge.
- c. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges; nor does it authorize or relieve the permittee of any liability for any injury to private property or any invasion of personal rights; nor any infringement of Federal, State, or local laws or regulations; nor does it waive the necessity of obtaining any local assent required by law for the discharge authorized herein by the Department.
- d. The provisions of this permit are severable, and the invalidity of any condition or subdivision thereof shall not make void any other condition or subdivision thereof.
- e. All information and data provided by an applicant or a permittee identifying the nature and frequency of a discharge shall be available to the public without restriction. All other information (other than effluent data) which may be submitted by an applicant in connection with a permit application shall also be available to the public unless the applicant or permittee is able to demonstrate that the disclosure of such information or particular part thereof to the general public would divulge methods or processes entitled to protection as trade secrets in accordance with the provisions of M.G.L. c.21, Section.27(7). Where the applicant or permittee is able to so demonstrate, the Department shall treat the information or the particular part (other than effluent data) as confidential and not release it to any unauthorized person. Such information may be divulged to other officers, employees, or authorized representatives of the Commonwealth or the United States Government concerned with the protection of public water or water supplies.
- f. Transfer of Permits. Any sewer system connection permit authorizing an industrial discharge to a sewer system is only valid for the person to whom it is issued, unless prior to transfer:
 - i. The current permittee notifies the Department in writing at least 30 days in advance of the proposed transfer date; and
 - ii. The notice includes a written agreement between the existing and new permittees containing a specific date for transfer of permit responsibilities, and liability to the new permittee.
- g. This permit authorizing the discharge expires five (5) years from the date of issuance. The permittee shall apply for a renewal of this permit at least ninety (90) days prior to the expiration date, in accordance with 314 CMR 7.09(3)(b) for continued lawful discharges beyond the expiration date. h. All solids, sludge, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters shall be collected, treated, and disposed of in accordance with applicable provisions in the following:
 - i. Hazardous waste regulations (310 CMR 30.000).
 - ii. Solid waste regulations (310 CMR 19.00).
 - iii. Sewer discharge regulations (314 CMR 7.00).
 - iv. Any other applicable federal, state and local laws.
- i. All samples shall be analyzed by a Massachusetts Certified Laboratory.
- j. The permittee shall provide the Department, and the Department's employees, authorized representatives and contractors, access at to the facility at all reasonable times, including during wastewater treatment system operation or wastewater discharge, for purposes of conducting activities related to oversight of this permit, including inspections to monitor compliance with the terms herein. The permittee shall allow the Department to obtain information related to compliance with the requirements of this permit. Notwithstanding any provision of this permit, the Department retains all of its access authorities and rights under applicable state and federal law.



Bureau of Waste Prevention - Industrial Wastewater

BWP IW 38 & BWP IW 39

Permit for Industrial Sewer User

W204096	
Transmittal Number	

Facility ID# (if known)

G. Certification Statement

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true accurate, and complete. I certify that this facility is in compliance with all conditions and requirements of this permit, and all applicable statutes and regulations. I further certify that systems to maintain compliance are in place at the facility or unit and will be maintained even if processes or operating procedures are changed. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment of knowing violations."

(I will be responsible for publication of public notice of the applicable permit proceedings identified under 314 CMR 2.06(1)(a) through (d).)

MassDEP Use Only

Printed Name of Applicant
Director of Facilities
Title Of Black
GI CAUTAL)
Signature of Applicant
5-21-08
Date Signed
•
Wayne E. Bates, PhD, PE
Name of Preparer
Engineering Manager
Title
508-970-0033
Phone Number

Joseph Chilton

Special Conditions:	
	lassachusetts General Laws, Chapter 21, Section 43 and he permittee shall comply with all of the provisions contained in trated and made part of this permit.
Date Issued	
Permit Effective Date	Permit Expiration Date
Name of Regional BWP Section Chief	Signature

Attachment B-1 Maximum Daily Flows + Sewer Connection Figures

Connection Number	Α	В	1	2	Total Flow
Report Reference Tables	1B	4B	2B	3B	
	GPD	GPD	GPD	GPD	GPD
Sanitary	2,250	8,055	43,705	3,450	57,460
Industrial	750	0	795	6,800	8,345
Total	3,000	8,055	44,500	10,250	65,805

Figure 1: Buildings discharging to each connection

Figure 2: Site Plan

Figure 3: Site Plan showing sewer connections

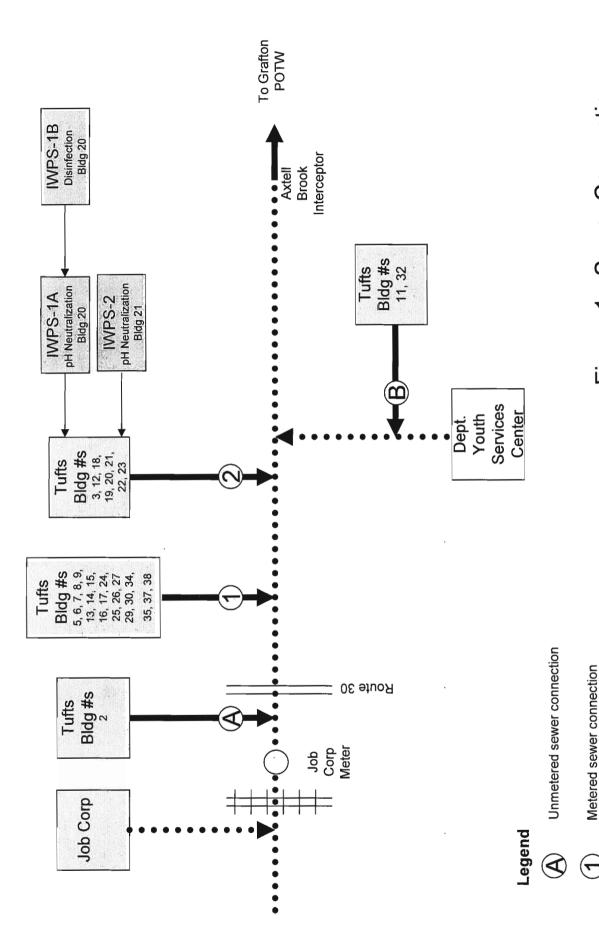


Figure 1 - Sewer Connections
Tufts University
Cummings School of Veterinary Medicine

North Grafton, MA Date: 12-28-2007

Tufts Univ. sewer main

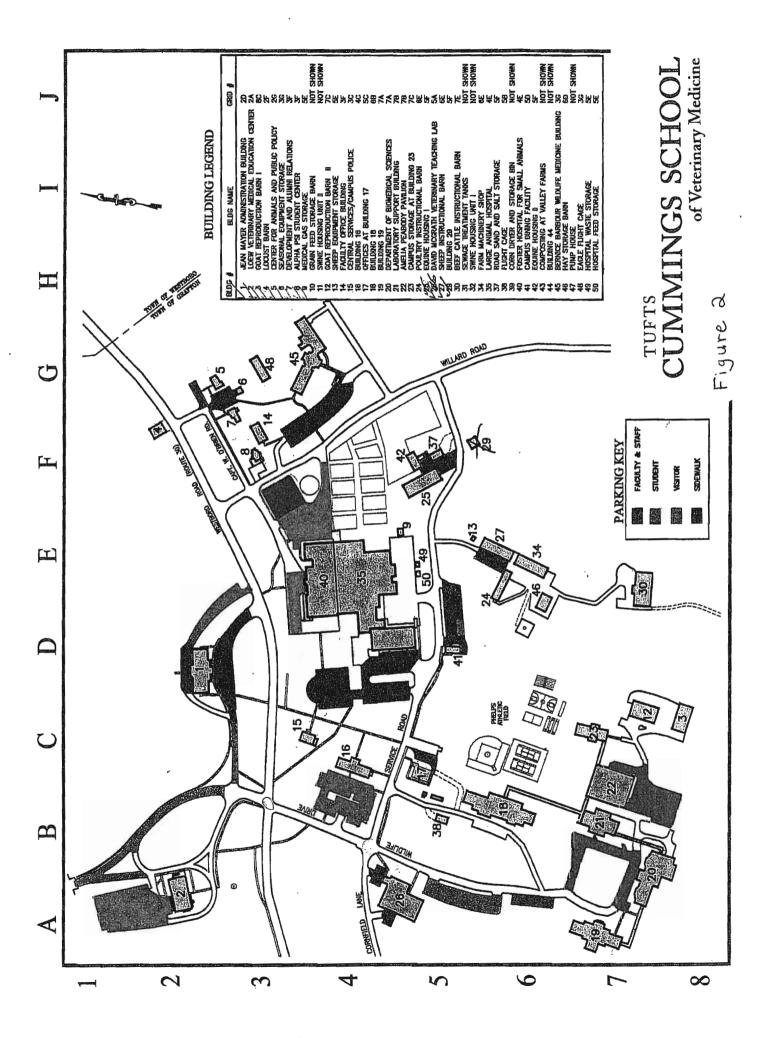
rail road tracks

##

Town sewer main

?

Scale: NTS3





Attachment B-2 Laboratory Analytical Results

ALPHA ANALYTICAL LABORATORIES

Eight Walkup Drive

Westborough, Massachusetts 01581-1019

(508) B98-9220

www.alphalab.com

MA:M-MA086 NH:200301-A CT:PH-0574 ME:MA086 RI:65 NY:11148 NJ:MA935 Army:USACE

CERTIFICATE OF ANALYSIS

Client: Capaccio Environmental Engineering Laboratory Job Number: L0719024

Address: 293 Boston Post Road

Date Received: 21-DEC-2007

Marlboro, MA 01752

Date Reported: 09-JAN-2008

Attn: Mr. Wayne Bates Delivery Method:

· Project Number:

Site: UNTREATED WASTEWATER

ALPHA SAMPLE NUMBER	CLIENT IDENTIFICATION	SAMPLE LOCATION
L0719024-01 L0719024-02 L0719024-03 L0719024-04	BUILDING 20 COMPOSITE BUILDING 20 GRAB BUILDING 21 COMPOSITE BUILDING 21 GRAB	200 WESTBORO RD, GRAFTON 200 WESTBORO RD, GRAFTON 200 WESTBORO RD, GRAFTON 200 WESTBORO RD, GRAFTON

Authorized by:

Technical Representative

01090813:30 Page 1 of 10

I, the undersigned, attest under the pains and penalties of perjury that, based upon my personal inquiry of those responsible for obtaining the information, the material contained in this report is, to the best of my knowledge and belief, accurate and complete. This certificate of analysis is not complete unless this page accompanies any and all pages of this report.

ALDHA ANALVTICAL LABORATORIES

NARRATIVE REPORT Laboratory Job Number: L0719024								
The samples were received in accordance with the chain of custody and no significant deviations were encountered during preparation or analysis unless otherwise noted below.								

MA:M-MA086 NH:200301-A CT:PH-0574 ME:MA086 RI:65 NY:11148 NJ:MA935 Army:USACE

Laboratory Sample Number: L0719024-01

Date Collected: 21-DEC-2007 12:00

BUILDING 20 COMPOSITE

Date Received: 21-DEC-2007

Sample Matrix: WATER Date Reported: 09-JAN-2008

Condition of Sample: Satisfactory

Field Prep: None

Number & Type of Containers: 2-Amber, 2-Plastic

PARAMETER	RESULT	UNITS	RDL	REF METHOD			ID
					PREP	ANAL	
Chromium, Hexavalent	ND	mg/l	0.010	30 3500cR-D	1221 20:00	1221 20:00	НS
Total Metals				19 200.7			
Antimony, Total	ND	mg/l	0.050	19 200.7	0106 13:00	0109 10:39	ΑI
Arsenic, Total	ND	mg/l	0.005	19 200.7	0106 13:00	0109 10:39	AΙ
Beryllium, Total	ND	mg/l	0.005	19 200.7	0106 13:00	0109 10:39	ΑI
Cadmium, Total	ND	mg/l	0.005	19 200.7	0106 13:00	0109 10:39	AI
Chromium, Total	ND	mg/l	0.01	19 200.7	0106 13:00	0109 10:39	ΑI
Copper, Total	0.046	mg/l	0.010	19 200.7	0106 13:00	0109 10:39	ΑI
Lead, Total	ND	mg/l	0.010	19 200.7	0106 13:00	0109 10:39	ΑÏ
Nickel, Total	ND	mg/1	0.025	19 200.7	0106 13:00	0109 10:39	ΑI
Selenium, Total	ND	mg/l	0.010	19 200.7	0106 13:00	0109 10:39	AI
Silver, Total	ND	mg/l	0.007	19 200.7	0106 13:00	0109 10:39	IA
Thallium, Total	ND	mg/l	0.020	19 200.7	0106 13:00	0109 10:39	A.I
Zinc, Total	ND	mg/l	0.050	19 200.7	0106 13:00	0109 10:39	ΑI

MA:M-MA086 NH:200301-A CT:PH-0574 ME:MA086 RI:65 NY:11148 NJ:MA935 Army:USACE

Laboratory Sample Number: L0719024-02

Date Collected: 21-DEC-2007 12:00

BUILDING 20 GRAB

Date Received: 21-DEC-2007

Sample Matrix:

WATER

Date Reported: 09-JAN-2008

Condition of Sample:

Satisfactory

Field Prep: None

Number & Type of Containers: 2-Vial

PARAMETER RESULT UNITS RDL REF METHOD DATE ΤD PREP ANAL

****** THIS SAMPLE IS ON HOLD ******

Not analyzed based on operator knowledge.
Wagne S. Belson

MA:M-MA086 NH:200301-A CT:PH-0574 ME:MA086 RI:65 NY:11148 NJ:MA935 Army:USACE

Laboratory Sample Number: L0719024-03

Date Collected: 21-DEC-2007 12:15

BUILDING 21 COMPOSITE

Date Received : 21-DEC-2007

Sample Matrix: WATER Date Reported : 09-JAN-2008 .

Condition of Sample:

Satisfactory

Field Prep: None

Number & Type of Containers: 2-Amber, 2-Plastic

PARAMETER	RESULT	UNITS	RDL	REF METHOD	DA!	re in
					PREP	ANAL
Chromium, Hexavalent	ND	mg/l	0.010	30 3500CR-D	1221 20:00	1221 20;00 HS
Total Metals				19 200.7		
Antimony, Total	ND	mg/l	0.050	19 200.7	0106 13:00	0109 10:43 AI
Arsenic, Total	ИD	mg/l	0.005	19 200.7	0106 13:00	0109 10:43 AI
Beryllium, Total	ИD	mg/l	0.005	19.200.7	0106 13:00	0109 10:43 AI
Cadmium, Total	ND	mg/l	0.005	19 200.7	0106 13:00	0109 10:43 AI
Chromium, Total	ND	mg/l	0.01	19 200.7	0106 13:00	0109 10:43 AT
Copper, Total	0.052	mg/l	0.010	19 200.7	0106 13:00	0109 10:43 AI
Lead, Total	ИД	mg/l	0.010	19 200.7	0106 13:00	0109 10:43 AI
Nickel, Total	ND	mg/l	0.025	19 200.7	0106 13:00	0109 10:43 AI
Selenium, Total	ND	mg/l	0.010	1.9 200.7	0106 13:00	0109 10:43 AI
Silver, Total	ND	mg/l	0.007	19 200.7	0106 13:00	0109 10:43 AI
Thallium, Total	ND	mg/l	0.020	19 200.7	0106 13:00	0109 10:43 AI
Zinc, Total	0.068	mg/l	0.050	19 200.7	0106 13:00	0109 10:43 AI

Comments: Complete list of References and Glossary of Terms found in Addendum I

MA:M-MA086 NH:200301-A CT:PH-0574 ME:MA086 RI:65 NY:11148 NJ:MA935 Army:USACE

Laboratory Sample Number: L0719024-04

Date Collected: 21-DEC-2007 12:15

BUILDING 21 GRAB

Date Received: 21-DEC-2007

Sample Matrix:

Date Reported: 09-JAN-2008

Condition of Sample:

Satisfactory

Field Prep: None

Number & Type of Containers: 2-Vial

PARAMETER

RESULT

UNITS

REF METHOD

RDL

DATE

ID

PREP ANAL

***** THIS SAMPLE IS ON HOLD ******

Not analyzed based on operator lenousledge.

Wayn E. But

01-10-08

ALPHA ANALYTICAL LABORATORIES QUALITY ASSURANCE BATCH DUPLICATE ANALYSIS

Laboratory Job Number: L0719024

Parameter	Value 1	Value 2	Units	·· RPD	RPD Limits	
: Chromium,	Hexavalent for	sample(s)	01,03 (L07)	19015-01,	WG306761-3)	
Chromium, Hexavalent	ND	ND .	mg/l	NC	20	
Total	Metals for sam	ple(s) 01,0	3 (L071901	5-01, WG30	07786-1)	
Antimony, Total	ND	ND	mg/l	NC		
Arsenic, Total	ND	ND	mg/l	NC		
Beryllium, Total	ND	ND	mg/l	NC		
Cadmium, Total	ND	ND	mg/l	NC		
Chromium, Total	ND	ND	mg/l	NC		
Copper, Total	ND	ND	mg/l	NC		
Lead, Total	ND ·	ND	mg/l	ИC		
Nickel, Total	ND	ND	mg/l	NC		
Selenium, Total	· ND	ND	mg/l	NC		
Silver, Total	ND	ND	mg/l	NC		
Thallium, Total	ND	ND	mg/l	NC		
Zinc, Total	0.116	0.123	mg/l	6		

ALPHA ANALYTICAL LABORATORIES OUALITY ASSURANCE BATCH SPIKE ANALYSES

Laboratory Job Number: L0719024

```
% Recovery QC Criteria
Parameter
          Chromium, Hexavalent LCS for sample(s) 01,03 (WG306761-2)
Chromium, Hexavalent
                                              98
               Total Metals LCS for sample(s) 01,03 (WG307786-4)
Antimony, Total
Arsenic, Total
                                              100
Beryllium, Total
Cadmium, Total
                                              112
Chromium, Total
Copper, Total
Lead, Total
                                              103
Nickel, Total
                                              100
Selenium, Total
                                              109
Silver, Total
                                              92
Thallium, Total
                                              102
Zinc, Total
                                              103
  ! Chromium, Hexavalent SPIKE for sample(s) 01,03 (L0719015-01, WG306761-4)
                                              101
                                                        85-115
Chromium, Hexavalent
      Total Metals SPIKE for sample(s) 01,03 (L0719015-01, WG307786-2)
Antimony, Total
                                              97
Arsenic, Total
                                              108
                                              97
Beryllium, Total
Cadmium, Total
                                              110
                                              95
Chromium, Total
Copper, Total
                                              93
Lead, Total
                                              101
Nickel, Total
                                              96
Selenium, Total
                                              111
Silver, Total
                                              94
                                              99
Thallium, Total
                                              103
Zinc, Total
```

ALPHA ANALYTICAL LABORATORIES QUALITY ASSURANCE BATCH BLANK ANALYSIS

Laboratory Job Number: L0719024

PARAMETER	RESULT	UNITS	RDL	REF METHOD	DA PREP	TE ANAL	ID
			_				
Blank	Analysis for sa	umple(s) 01,03	(WG306	761~1)			
hromium, Hexavalent	ND	mg/l	0.010	30 3500CR-D	1221 20:00	1221 20:00	HS
Blank	Analysis for sa	mple(s) 01,03	(WG307	786-3)			
otal Metals				19 200.7			
ntimony, Total	ND	mg/l	0.050	19 200.7	0106 13:00	0108 11:41	AI.
rsenic, Total	ND	mg/l	0.005	19 200.7	0106 13:00	0108 11:41	AI
eryllium, Total	ND	mg/l	0.005	19 200.7	0106 13:00	0108 11:41	ΑI
Cadmium, Total	ND	mg/l·	0.005	19 200.7	0106 13:00	0108 11:41	AI
hromium, Total	ИД	mg/l	0.01	19 200.7	0106 13:00	0108 11:41	ΑI
Copper, Total	ND	mg/l	0.010	19 200.7	0106 13:00	0108 11:41	Αĩ
ead, Total	ND	mg/l	0.010	19 200.7	0106 13:00	0108 11:41	ΑI
lickel, Total	ND	mg/l	0.025.	19 200.7	0106 13:00	010B 11:41	AI
elenium, Total	ND	mg/l	0.010	19 200.7	0106 13:00		
ilver, Total	ND	mg/l	0.007	19 200.7	0106 13:00		
hallium, Total	ND	mg/l	0.020	19 200.7	0106 13:00		
inc, Total	ND	mg/l	0.050	19 200.7	0106 13:00		

ALPHA ANALYTICAL LABORATORIES ADDENDUM I

REFERENCES

- 19. Inductively Coupled Plasma Atomic Emission Spectrometric Method for Trace Element Analysis of Water and Wastes. Appendix C, Part 136, 40 CFR (Code of Federal Regulations). July 1, 1999 edition.
- 30. Standard Methods for the Examination of Water and Wastewater, APHA-AWWA-WPCF. 18th Edition, 1992.

GLOSSARY OF TERMS AND SYMBOLS

REF Reference number in which test method may be found.

METHOD Method number by which analysis was performed.

ID Initials of the analyst.

ND Not detected in comparison to the reported detection limit.

NI Not Ignitable.

ug/cart Micrograms per Cartridge.

H The analysis of pH was performed beyond the regulatory-required holding time of 15 minutes from the time of sample collection.

LIMITATION OF LIABILITIES

Alpha Analytical, Inc. performs services with reasonable care and diligence normal to the analytical testing laboratory industry. In the event of an error, the sole and exclusive responsibility of Alpha Analytical, Inc., shall be to re-perform the work at it's own expense. In no event shall Alpha Analytical, Inc. be held liable for any incidental consequential or special damages, including but not limited to, damages in any way connected with the use of, interpretation of, information or analysis provided by Alpha Analytical, Inc.

We strongly urge our clients to comply with EPA protocol regarding sample volume, preservation, cooling, containers, sampling procedures, holding times and splitting of samples in the field.

01090813:30 Page 10 of 10

	environmental	industria

Phone (781) 455-0003 Needham, MA 02494 Fax (781) 455-8336 EST, Inc. 51 Fremont Street

Chain of Custody R

Container Type B - Bacteria P - Plastic G - Glass V - VOA www.estassociates.com

aboratory: Alpha Analytical Labs	(508) 898-9220
secord La	pole Type

Lab Invoice To: Tufts Grafton Lab Report To: Wastewater 5. Surface Water
 Groundwater 6. Storm Water 7. Other Sample Type

4. Drinking Weter

3. Soil

wbales@capaccio.com

EST Invoice To: Tufts Grafton	7921-JEC-xx	

Tufts University Grafton

Client: Address:

Tufts University Grafton

Site: Address:

200 Westboro Road

200 Westboro Road

01536-

ΜĀ

(508) 839-7921 Joe Chilton Grafton

> Contact: Phone #:

Rush	Day Tumaround

ne

Rush	ď.

	,	:		
	Grafton	MA	01536-	
Contact:	Joe Chilton			Rush
Phone #:	Phone #: (508) 839-7921			
Fax #				Routin

Routine	Notes	
	Laboratory Analysis	
Fax#:	Preservative	
- Fa	Sampling	Date Time
ampling	Container	Size Twne #
fewaier Sa	Sample	l ype
Description: Untreated Wastewaier Sampling	LOCATION (Sample	Identification)

LOCATION (Sample	Sample		Container	Sa	Sampling	Preservative	Laboratory Analysis	Notes
Identification)	Туре	Size	Type	# Date	Time	*		
Building 20 Composite		500 ml	а.	1 2 20-2		HN03	Sb,As,Be,Cd,Cr,Cu,Pb,Ni,Se,Ag,TI,Zn	PJ-7 = Hd
Building 20 Composite	·	500 ml	۵	7.		None	CrVI	Temp = [0 5/
Building 20 Composite	-	11	ပ	2	>	None	625*Lab to HOLD analysis per Capaccio	0 1 1
Building 20 Grab	-	40 ml	>	2 12/21	1200	Na2S203	624*Lab to HOLD analysis per Capaccio	
Building 21 Composite	-	500 ml	۵	1 12/20-21	当	HNO3	Sb,As,Be,Cd,Cr,Cu,Pb,Ni,Se,Ag,TI,Zn	PH = 7.49
Building 21 Composite	-	500 ml	۵	-	<u>2</u> -	None	CrVI	Temp = 14.2
Building 21 Composite	-	11	ŋ	2	>	None	625*Lab to HOLD analysis per Capaccio	
Building 21Grab	-	40 ml	>	2/2/21	1215	Na2S203	624*Lab to HOLD analysis per Capaccio	
		,						
		•					-	
Sampler's Name (Print)	Signature	,,		DATE	TIME	NUMBER TRANS!	NUMBER TRANSFERS RELINQUISHED BY ARANGFERS ACCEPTED BY	BY DATE TIME
Mat (1041)	Mat	/ Bray		12/11/07	5121 2	1	A Hall Gillet	13/2/61 16:00
Additional Comments:	•	· >				2 (Sout	Miles y	1/4/1/800
						3		

4 2

*All samples chilled to 4 degrees celsius.

Attachment B-3 Letter of Agreement with Town of Grafton Sewer Commission



Town of Grafton

Board of Sewer Commissioners

Grafton Memorial Municipal Center 30 Providence Boad Grafton, Massachusetts 01519

508 839·4435 x185

April 8, 2008

Mr. Joseph Chilton Tufts University Cummings School of Veterinary Medicine 200 Westborough Road Grafton MA 01536

RE: Permission to Discharge

Dear Mr. Chilton:

Tufts University, Cummings School of Veterinary Medicine (TUFTS) is authorized to discharge wastewater through the Town of Grafton Sewerage System to the Town of Grafton Sewer Treatment Plant.

The Board of Sewer Commissioners (BOARD) reserves the right to require TUFTS to reapply for permission to discharge based on potential changes to wastewater quantity and/or quality from existing or proposed operations.

Permission granted with this letter does not relieve TUFTS of its obligations to comply with other applicable local, state, and federal pretreatment laws, regulations, standards and requirements, including those that may become effective subsequent to the issuance of this letter.

APP	ΚŲ	VE.	D:
-----	----	-----	----

Board of Sewer Commissioners

By:

David L. Therrien, Chairman

7)

7 April 2008

Date

Gerald L. LeBlanc, Member

7 April 2008

Date

TOWN OF GRAFTON

WASTEWATER TREATMENT FACILITY

CHARLES BOHABOY JR.
Superintendent of Sewers

Phone: 508.839.8526 fax: 508.839.8523

F-mail: wpcf@gis.net

FA	CSIMILE TRANSMITTAL SHEET
TO:	FROM:
Wayne Bates	Paul Cournoyer
Capaccio Eng.	1 May 2008
FAX NUMBER:	TOTAL NO. OF PAGES INCLUDING COVER:
	2
PHONE NUMBER:	SENDER'S REFERENCE NUMBER:
RE;	YOUR REFERENCE NUMBER:
□ URGENT □ FOR REVIEW	□ PLEASE COMMENT □ PLEASE RECYCL
NOTES/COMMENTS:	

Attachment C-1 Pretreatment System Design Calculation Sheet

Building 20 – pH Neutralization System

Tank Volume = 250 gal. Q = V/t

Detention Time = 15 min. = 250 gal / 15 min = 16.7 gal/min

Assume System is designed to treat 15 gpm

15 gal/min * 60 min/hr * 24 hr/day = 21,600 gal/day

Based on conversations with the wastewater operator, average daily flow through the system is approximately 2,500 gal/day with a maximum daily flow of approximately 5,000 gal/day in extreme cases.

Building 20 - Disinfection System

The disinfection system is designed with two 80 gallons each that run in parallel and have a cycle time of 60 minutes. Therefore the treatment system is capable of treating 160 gal/hr.

$$160 \text{ gal/hr} * 24 \text{ hr/day} = 3,840 \text{ gal/day}$$

Based on conversations with the wastewater operator, average daily flow through the system is approximately 1,000 gal/day with a maximum daily flow of approximately 2,000 gal/day in extreme cases.

Building 21 – pH Neutralization System

Tank Volume = 200 gal. Q = V/t

Detention Time = 15 min. = 200 gal / 15 min = 13.3 gal/min

Assume System is designed to treat 10 gpm

10 gal/min * 60 min/hr * 24 hr/day =
$$14,400$$
 gal/day

Based on conversations with the wastewater operator, average daily flow through the system is approximately 1,000 gal/day with a maximum daily flow of approximately 2,000 gal/day in extreme cases.

Attachment C-2 Building 20 and 21 – pH Neutralization Systems

Enclosed as Attachment C-2 is a letter dated November 3, 2006 to Board of Wastewater Treatment Operators, which contains the following information:

- Building 20 pH Neutralization System (IWPS 1A)
 - o Description of system
 - o Grading report
 - o Process flow diagram
- Building 21 pH Neutralization System (IWPS 2)
 - o Description of system
 - o Grading report
 - o Process flow diagram

"Helping Industry and the Environment Prosper"

VIA CERTIFIED MAIL RETURN-RECEIPT REQUESTED: 7006 0100 0005 2867 4457

November 3, 2006

Board of Wastewater Treatment Plant Operators
Attention: Tom Bienkiewicz
Massachusetts Department of Environmental Protection
Central Regional Office
627 Main St.
Worcester, MA 01608

RE: Tufts Cummings School of Veterinary Medicine

200 Westboro Road North Grafton, MA 01536

Industrial Wastewater Pretreatment Facility Grading Report

Project No. 06-046

Dear Mr. Bienkiewicz:

Capaccio Environmental Engineering, Inc. (CAPACCIO) is submitting this Industrial Wastewater Pretreatment (WWT) Facility Grading Report on behalf of our client, Tufts Cummings School of Veterinary Medicine (TUFTS). TUFTS accepts 80 new students each year in order to provide a modern veterinary education including research, diagnosis, and medical treatment of small and large domestic and wild animals.

TUFTS generates wastewater from its laboratories and animal cage washing operations located in Buildings 20 and 21. Wastewater is discharged from these operations to the Grafton Wastewater Treatment Plant following pH adjustment and effluent monitoring. TUFTS maintains two separate pH adjustment systems which handle waste from each building. The pH adjustment systems are located in Building 20 and Building 21. A description of each treatment system follows.

Building 20 – Wastewater from the laboratories and cage washing operations is discharged to a two-stage pH adjustment system consisting of two, 250-gallon tanks equipped with mixers, pH sensors, and pH controllers. The wastewater then flows by gravity to the building's sanitary sewer line (see figure number PFD-20-1).

The pH neutralization system operates on a continuous, flow-through basis. The system accepts incoming streams of aqueous solutions from laboratories located in the building and discharges treated liquids by gravity flow as new incoming liquid displaces volume in each tank. Wastewater enters Mix Tank T-01, which is a 250-gallon (185-gallon working volume) stage 1 neutralization tank. This tank is mixed by a top-entering agitator that rapidly disperses new incoming liquids and treatment chemicals to provide a high degree of uniformity of concentration in the tank. The liquid's pH is continuously measured by a sensor immersed in the tank. The sensor is connected to a microprocessor-based controller with full bi-directional proportional, integral and derivative control (PID). The controller automatically initiates treatment with sodium hydroxide via the appropriate metering pump when the measured pH exceeds the low set point

for the tank. The PID controller starts, stops, and directly regulates the pumping rate of the metering pump. A 50% sodium hydroxide solution is utilized to adjust the pH within tank T-01.

Treated wastewater overflows via a 4" polypropylene pipe and enters the Trim Tank, T-02, which is the second stage of pH adjustment. In tank T-02, sodium hydroxide or sulfuric acid is automatically injected into the tank via a metering pump based on wastewater pH. The liquid enters the 250-gallon (175-gallon working volume) neutralization tank and is mixed by a topentering agitator that rapidly disperses new incoming liquids and treatment chemicals to provide a high degree of uniformity of concentration in the tank. The pH of the liquid in the tank is continuously measured by a sensor immersed in the tank. The sensor is connected to a microprocessor-based controller with full bi-directional proportional, integral and derivative control (PID). The controller automatically initiates treatment with the appropriate pump when the measured pH exceeds the high or low set points for the tank. The PID controller starts, stops, and directly regulates the pumping rate of each metering pump. The reagents used are 93% sulfuric acid (66 baumé) and 50% sodium hydroxide.

The discharge from the tank passes through a running u-trap with one extended leg. This trap has a pH sensor mounted within. This sensor continuously monitors the pH of the liquid discharge after treatment and records it on a circular chart recorder. High and low pH alarms provide visual indication of either a high or low pH condition on the control panel.

Building 21 – This pH neutralization system operates on a continuous, flow-through basis (see figure PFD-21-1). The system accepts incoming streams of aqueous solutions from laboratories located in the building and discharges treated liquids by gravity flow as new incoming liquid displaces volume in the tank. The liquid enters the 200 gallon (150 gallon working volume) neutralization tank and is mixed by a top-entering agitator which rapidly disperses all new incoming liquids and treatment chemicals to provide a high degree of uniformity of concentration in the tank. The pH of the liquid in the tank is continuously measured by a sensor immersed in the tank. The sensor is connected to a microprocessor based controller with full bi-directional proportional, integral and derivative control (PID). The controller automatically initiates treatment with the appropriate pump when the measured pH exceeds either of the two (high and low) set points for the tank. The PID controller starts, stops, and directly regulates the pumping rate of each metering pump. The reagents used are 93% sulfuric acid (66 baumé) and 50% sodium hydroxide.

The discharge from the tank passes through a running u-trap with one extended leg. This trap has a pH sensor mounted within. This sensor continuously monitors the pH of the liquid discharge after treatment and records it on a circular chart recorder. High and low pH alarms provide audible and visual alarm indication of either a high or low pH condition.

The treatment system in building 21 is located below grade; therefore, wastewater must be pumped to the existing sewer connection line. To achieve this, wastewater flows by gravity from the pH adjustment tank directly into a 90-gallon pump station. The pump station utilizes a ½ hp vertical centrifugal type pump connected to a float controller that automatically pumps wastewater in to the building's sanitary sewer line. When the float reaches a high level the pump activates and pumps down to the station's low level. A separate high level alarm float located in the pump station activates if tank liquid level increases above normal. If the high level float is activated for any reason, an audible and visual alarm activates on the pump control panel.

Based on the aforementioned descriptions of WWT system unit operations, and based on the Board Policy implemented on January 13, 1994 which states that pH Neutralization Systems which include only chemical addition, flow measurement, instrumentation, and pumping in plant shall command a rating of 3 to 4 points in our opinion we a score of 4 points for each of TUFTS' pH adjustment systems. This rating results in a grading level of 1-I for the wastewater treatment system located in Building 20 and a grading level of 1-I for the wastewater treatment system located in Building 21.

If you have any questions or require additional information, please call 508-970-0033 extension 34 for Seth Forden or extension 21 for Wayne Bates.

Very truly yours,

Capaccio Environmental Engineering, Inc.

BY:

Seth Forden

Environmental Engineer

Wayne E. Bates, PhD, PE

Manager, Engineering Group

Enclosures:

WWT Facility Grading Report

- Building 20
- Building 21

WWT Process Flow Schematic

- PFD-20-1
- PFD-21-1

CC:

J. Chilton W. Bates

(TUFTS) (CAPACCIO)

MF

(06-046)

Building 20

MASSACHUSETTS BOARD OF CERTIFICATION OF WASTEWATER TREATMENT PLANT OPERATORS

FACILITY GRADING REPORT

Facility Name: Tufts Cummings School	of Veterianary Med.	File No.	
Street Address: 200 Westboro Road			
City/Town: North Grafton	State: MA		Zip: 01536
Telephone: 508-839-7921		, , , , , , , , , , , , , , , , , , , ,	
Contact Name and Title: Joe Chilton, Fa	cilities Manager		
Di	scharge Permit Numb	ers	
NPDES No.			
Date Received:			
Rating Results:	Date:		Approved:
Industrial or Municipal: Industrial			
Rating Total: 3-4		·	
Grade: 1I			

CLASS	<u>CUMULATIVE RATING VALUE</u>
Class (M or I)	1-7
Class 2 (M or I)	8-20
Class 3 (M or I)	21-30
Class 4 (M or I)	31-50
Class 5	51-65

RATING VALUES FOR CLASSIFICATION	ON OF FACILITIES	
UNIT	RATING	SCORE
Aeration mechanical or diffused air greater than 0.5 MGD less than 0.5 MGD		
Aeration: sludge, reaeration		
Aeration: pure oxygen greater than 0.5 MGD		
BOD Removal		
* BOD removal Rating = Design BOD in Pounds/Day X "f" 1000 "f" = 0.3 for primary treatment and 0.8 for secondary or higher facilities		
Carbon Filter		
Carbon Reactivation		
Centrifuge		
Chemical Addition	2	4
Chlorination pre, gas or liquid		
Chlorination post, gas or liquid		
Clarifier, tube setting or inclined plate		
Clariflocculation		
Coagulation and Neutralization		
Comminutation		
Condenser	· · · · · · · · · · · · · · · · · · ·	
Cooling Tower		
Dechlorination '		
Denitrification		
Dissolved Air Flotation		
Electrodialysis		
Equalization		
Evaporators		
Extended Aeration; greater than 0.1 MGD less than 0.5 MGD		

٠.

Extended Aeration equal to or less than 0.1 MGD	1	
Flash Mixing		
Flow measurement		
Flocculation		
Grit Chamber Aerated		
Grit Chamber manually cleaned		
Grit Chamber mechanical grit removal		
Heat Exchangers	•	
High rate filtration units less than 0.1 MGD greater than 0.1 less than 0.5 MGD greater than 0.5 less than 0.1 MGD greater than 1.0 MGD		
Hypochlorite generation		
Hypochlorination pre and/or post		
Hydrocyclones (grit removal)		
Imhoff tanks		
Incineration		
Ion exchange		
Laboratory		
Land Irrigation, spraying		
Land Irrigation, direct discharge		
Membrane Filtration		
Nitrification		
Odor Control		
Oil Separation		
Oxidation Ditch		
Ozonation		
pH Neutralization System	3-4	4
Polishing Filter		
Post-acration (cascade)		
Pre-aeration (mechanical)		
Primary Settling; airlift or manual sludge removal		
Primary Settling; mechanical sludge removal		
Primary Sludge holding and mixing		

Pumping (in plant)	3	3
Pumping stations under operator's control		
Reaction vessel		
Reverse Osmosis		
Rotating Biological Contactors		
Rotating Biological Contactors		
Rotary Drum Dryers	,	
Sand Filters; Multi media, automatic back wash		
Sand Filters; intermittent		
Sand Filters; polishing		
Sand Filters; subsurface		
Screens (mechanical)		
Scum Concentrator		
Secondary Settling; airlift or manual sludge removal		
Secondary Settling; mechanical sludge removal		
Septage facilities		
Sludge blending		
Sludge Composting		
Sludge drying Beds		
Sludge digestion; aerobic		
Sludge digestion; heated and mixed anaerobic		
Sludge digestion; heated and unmixed, anaerobic		
Sludge digestion; unheated		
Sludge elutriation		
Sludge incinerators		
Sludge press; belt		
Sludge press; plate and frame		-
Sludge thickeners: floatation		
Stabilization ponds; non-aerated		
Stabilization ponds; aerated		
Stripping; air or steam .		
Trickling Filters; high rate	•	
Trickling, Filters; staged		

Trickling Filters; standard rate	2
Ultraviolet disinfection	2-5
Vacuum Filter	10
Wet Air Oxidation	10
Board Policy:	

Board Policy:

Comments: The sum of the cumulative points is 11; however, since these process operations are all encompassed under "pH adjustment system" the score should be 3 or 4 according to the Board Policy accepted Jan. 13, 1994.

Building 21

MASSACHUSETTS BOARD OF CERTIFICATION OF WASTEWATER TREATMENT PLANT OPERATORS

FACILITY GRADING REPORT

Facility Name: Tufts Cummings School	of Veterianary Med.	File No.		
Street Address: 200 Westboro Road				
City/Town: North Grafton	State: MA		Zip: 01536	
Telephone: 508-839-7921				
Contact Name and Title: Joe Chilton, F	acilities Manager			
Discharge Permit Numbers				
NPDES No.				
Date Received:				
Rating Results:	Date:		Approved:	
Industrial or Municipal: Industrial				
Rating Total: 3-4				
Grade: 1I				

CLASS	CUMULATIVE RATING VALUE
Class (M or I)	1-7
Class 2 (M or I)	8-20
Class 3 (M or I)	21-30
Class 4 (M or I)	31-50
Class 5	51-65

RATING VALUES FOR CLASSIFICAT	ION OF FACILITIES	
UNIT	RATING	SCORE
Aeration mechanical or diffused air greater than 0.5 MGD less than 0.5 MGD		
Aeration: sludge, reaeration		
Aeration: pure oxygen greater than 0.5 MGD		
BOD Removal		
* BOD removal Rating = Design BOD in Pounds/Day X "f" 1000 "f" = 0.3 for primary treatment and 0.8 for secondary or higher facilities		
Carbon Filter		
Carbon Reactivation		
Centrifuge		
Chemical Addition	2	4
Chlorination pre, gas or liquid		
Chlorination post, gas or liquid		
Clarifier, tube setting or inclined plate		
Clariflocculation		
Coagulation and Neutralization		
Comminutation		
Condenser		
Cooling Tower		
Dechlorination		
Denitrification		
Dissolved Air Flotation		
Electrodialysis		
Equalization		,
Evaporators		
Extended Aeration; greater than 0.1 MGD less than 0.5 MGD		

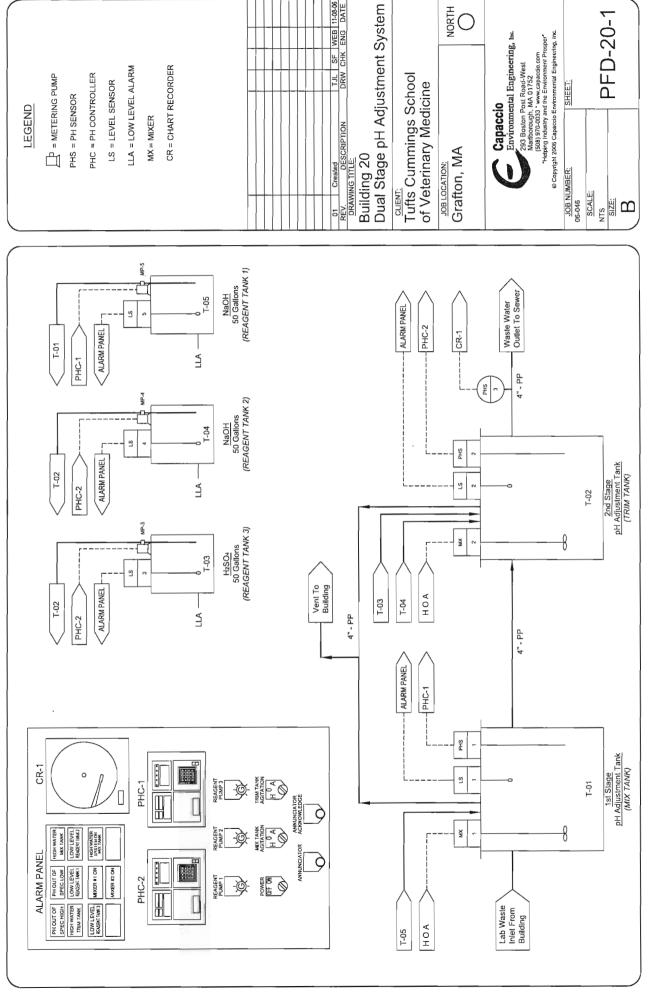
Extended Aeration equal to or less than 0.1 MGD		
Flash Mixing		
Flow measurement		
Flocculation		
Grit Chamber Aerated		
Grit Chamber manually cleaned		
Grit Chamber mechanical grit removal		
Heat Exchangers		
High rate filtration units less than 0.1 MGD greater than 0.1 less than 0.5 MGD greater than 0.5 less than 0.1 MGD greater than 1.0 MGD		
Hypochlorite generation		
Hypochlorination pre and/or post		
Hydrocyclones (grit removal)		
Imhoff tanks		
Incineration		
Ion exchange		
Laboratory		
Land Irrigation, spraying		
Land Irrigation, direct discharge		
Membrane Filtration		
Nitrification		
Odor Control		
Oil Separation		
Oxidation Ditch		
Ozonation		
pH Neutralization System	3-4	4
Polishing Filter		
Post-aeration (cascade)		
Pre-aeration (mechanical)		
Primary Settling; airlift or manual sludge removal		
Primary Settling; mechanical sludge removal		
Primary Sludge holding and mixing		

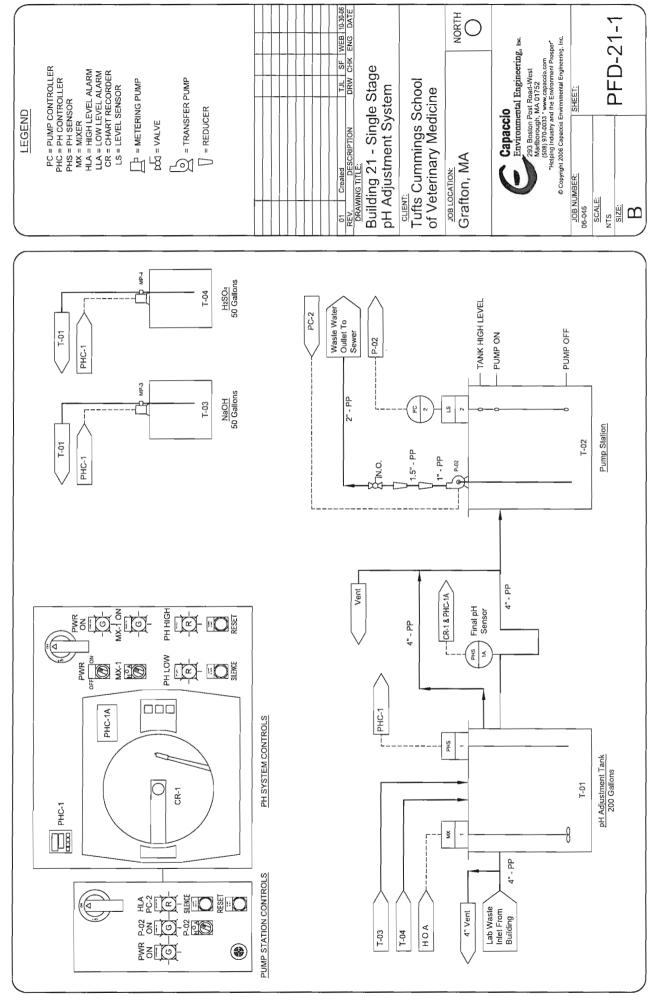
Pumping (in plant)		
Pumping stations under operator's control		
Reaction vessel		
Reverse Osmosis		
Rotating Biological Contactors	-	
Rotating Biological Contactors		
Rotary Drum Dryers		
Sand Filters; Multi media, automatic back wash		
Sand Filters; intermittent		
Sand Filters; polishing		
Sand Filters; subsurface		
Screens (mechanical)		
Scum Concentrator		
Secondary Settling; airlift or manual sludge removal		
Secondary Settling; mechanical sludge removal		
Septage facilities		
Sludge blending		
Sludge Composting		
Sludge drying Beds		
Sludge digestion; aerobic		
Sludge digestion; heated and mixed anaerobic		
Sludge digestion; heated and unmixed, anaerobic		
Sludge digestion; unheated		
Sludge clutriation		
Sludge incinerators		
Sludge press; belt		
Sludge press; plate and frame		
Sludge thickeners: floatation		
Stabilization ponds; non-aerated		
Stabilization ponds; aerated		
Stripping; air or steam		
Trickling Filters; high rate	,	
Trickling, Filters; staged		

Trickling Filters; standard rate	2	
Ultraviolet disinfection	2-5	
Vacuum Filter	10	
Wet Air Oxidation	10	
Board Policy:	•	

Board Policy:

Comments: The sum of the cumulative points is 8; however, since these process operations are all encompassed under "pH adjustment system" the score should be 3 or 4 according to the Board Policy accepted Jan. 13, 1994.





Attachment C-3 Building 21 – pH Neutralization System (IWPS – 2)

Enclosed as Attachment C-3 is the following information provided by the equipment manufacturer;

- Description of operations
- Equipment list

Tufts University
Building 21 / Phase II Project
Grafton, Massachusetts

PHS-200C pH Neutralization System

Description of System and Operation

This pH neutralization system operates on a continuous, flow-through basis. The system accepts incoming streams of aqueous solutions and discharges treated liquids by gravity flow as new incoming liquid displaces volume in each tank. The liquid enters the neutralization tank and is mixed by a top-entering agitator which rapidly disperses all new incoming liquids (including treatment chemicals) to provide a high degree of uniformity of concentration in the tank. The pH of the liquid in each tank is continuously measured by a sensor immersed in the tank. The sensor is connected to a microprocessor based controller with full bi-directional proportional, integral and derivative control (PID). The controller automatically initiates treatment with the appropriate pump when the measured pH exceeds either of the two (high and low) setpoints for that tank. The controller not only starts and stops the metering pumps, but also directly regulates the pumping rate of each pump. The reagents used are 50 - 93% sulfuric acid and 25 - 50% sodium hydroxide (other concentrations and reagents can be accommodated with minor adjustments).

The discharge from the tank passes through a running u-trap with one extended leg. This trap has a second pH sensor mounted in the trap. With this sensor, the pH of the discharged liquid is monitored continuously after treatment and recorded by a chart recorder. High and low pH alarms are included and will provide both audible and visual alarm indication of either condition.

Tufts University Building 21 / Phase II Project Grafton, Massachusetts

PHS-200 C pH Neutralization System

Equipment List

Quantity	Equipment Description
1	Neutralization Tank, Polyethylene, 200 gallon, 36" dia x 48"h (1) 4" injet fitting, (1) 3" vent fitting, (1) 4" outlet fitting
1	Mixer, 1/4 HP, 316 stainless steel wetted parts, gear drive mixer
2	Chemical Storage Tanks, 50 gallon, 21" dia x 38" deep
2	Metering Pumps (0.42 gph capacity), with tubing, foot valves, and injection valves
1	Immersion-type pH Electrode Assembly, with fittings, pH electrode and temperature compensation unit
1	In-line, Monitor pH Electrode Assembly, 4" U-trap fitting of polypropylene pipe, pH electrode, and temperature compensation unit
1	Set of fittings and instrumentation connectors for installation
1	Control Panel, NEMA 4 rated, fully wired and pre-tested, with the following equipment: • Process controls, with full, bi-directional, proportional, integral, and derivative (PID) pH control, and direct control outputs to regulate acid and alkali metering pump flow rates • Chart recorder for pH recording • Metering Pump control circuits • System and Mixer On/Off switches • Alarm Silence and Reset buttons with Alarm horn • Alarm annunciation section to show the following conditions: • System On • Mixer On • Outlet pH Low• Outlet pH High

Attachment C-4 Building 20 – Disinfection System (IWPS – 1B)

Enclosed as Attachment C-4 is a letter dated December 5, 2006 to Board of Wastewater Treatment Operators, which contains the following information:

- Building 20 Disinfection System (IWPS 1B)
 - o Description of system
 - o Grading report
 - o Process flow diagrams





VIA CERTIFIED MAIL RRR 7006 0100 0005 2867 5003

"Helping Industry and the Environment Prosper"

December 5, 2006

Mr. Tom Bienkiewicz
Board of Wastewater Treatment Plant Operators
Massachusetts Department of Environmental Protection
Central Regional Office
627 Main St.
Worcester, MA 01608

RE: Tufts Cummings School of Veterinary Medicine

200 Westboro Road North Grafton, MA 01536

Industrial Wastewater Pretreatment Facility Grading Report ADDENDUM

Project No. 06-046

Dear Mr. Bienkiewicz:

In a letter dated November 3, 2006 Capaccio Environmental Engineering, Inc. (CAPACCIO) submitted an Industrial Wastewater Pretreatment (WWT) Facility Grading Report on behalf of Tufts Cummings School of Veterinary Medicine (TUFTS). Following the report submittal, it was brought to our attention that an additional wastewater treatment system is in place for the Biosafety Level 3 laboratory in building 20 at the facility. The purpose of this document is to provide additional information in the form of an addendum to the WWT Facility Grading Report submitted on November 3, 2006 on behalf of TUFTS.

A portion of wastewater entering the Building 20 pH adjustment system comes from a Biosafety Level 3 (BL3) laboratory, which is pretreated through a batch disinfection system, also located in Building 20. Diagrams of the system operation are provided in the attached process flow diagrams.

The batch disinfection system is a DCL-80/2-SP as manufactured by Concorp, Inc. The system treats laboratory wastewater with sodium hypochlorite to kill bacteria based organisms in the laboratory wastewater effluent. The system is designed as a sequencing batch type system where the wastewater is treated in one stage while the incoming wastewater is collected in the other stage. The system accepts materials from selected BL3 laboratory sinks via the laboratory wastewater polypropylene drain pipe system and treats it in a sequencing batch cycle. The process operates in four (4) modes: Collection, Treatment/Recirculation, Discharge, and Emergency Collection Mode. The following description provides an example of collection and treatment in Tank T-02, for discussion purposes. However, the system is fully redundant and automated such that all modes can occur in either tank and the system automatically alternates between them.

Collection Mode. Wastewater is collected in one of the two 80 gallon treatment tanks. For purposes of this example, collection/treatment tank T-02 will initially be utilized for collection. Once the liquid level in tank T-02 reaches a preset point as indicated by a tank liquid level switch (LS-L4H), the motorized inlet valve (V-01) is automatically shut and the inlet motorized valve (V-02) to the second tank (T-03) is opened to collect wastewater in that tank. The first

tank (T-02) would then treat and discharge the wastewater while the second tank (T-03) is collecting new wastewater as generated from the BL3 lab. Attached drawing PFD-20-2A provides a flow diagram of the wastewater collection mode.

Treatment/Recirculation Mode. The treatment cycle is started in the appropriate tank (T-02 or T-03) based on liquid level or collection residence time. An ORP sensor (ORP-3) is located in the process recirculation piping loop between the pump discharge (P-03A) and the return piping to the treatment tank. A chemical injection port for injection of sodium hypochlorite is located downstream of the sensor (ORP-3). The metering pump (MP-04) is programmed to add sodium hypochlorite to the recirculating laboratory wastewater until the operator-selected set point is reached. Once the desired ORP level is achieved, the treated wastewater continues to recirculate for 60 minutes. During this time the ORP is continuously monitored. Additional sodium hypochlorite is added, if needed, during this time to maintain the desired ORP set point.

During treatment, the intake control valve (V-01 or V-02) is closed until the cycle has been completed, the tank is drained, and the drain valve (V-09) has been closed. The system inlet piping motorized control valves (V-07 or V-08) are actuated by the PLC based on the liquid high level sensors located in each treatment tank (LS-L4H or LS-L6H). In the event both tanks are full, as indicated by the treatment tank high level sensors, an alarm light and horn will be triggered as well as the common system alarm dry contacts.

The wastewater in the treatment tank is recirculated via a set of two horizontal centrifugal pumps (P-03A or P-03B) to facilitate mixing, ORP sensing and chemical injection. The pumps are designed and piped for redundant operation so that either pump can service either treatment tank. These pumps are designed for approximately 25 gpm flow rate. The recirculation pumps are set for automatic alternation. The recirculation pumps are also automatically set to shut-off at the low level liquid sensor level (LS-3L or LS-L5L). Both pumps are controlled via a Hand/Off/Auto switch at the system control panel. Following completion of wastewater treatment and recirculation, the system is programmed to commence discharge mode when operating automatically. Attached drawing PFD-20-2B provides a flow diagram of the wastewater treatment and recirculation mode.

Discharge Mode. The discharge mode of the treatment cycle can be operator initiated or automatic. Normally TUFTS operates the system in automatic mode in the following fashion: Upon completion of treatment and one-hour recirculation time, the control system opens an electrically actuated control valve (V-09). This allows the recirculation discharge pump (P-03A or P-03B) to direct the contents of the treatment tank (T-02 or T-03) to the drain. When the control system is ready to reset the system for a new treatment cycle, the electrically actuated valve (V-09) automatically closes. Attached drawing PFD-20-2C provides a flow diagram of the wastewater discharge mode.

Emergency Collection Mode. In the event that wastewater is discharged to the BL3 lab floor from a floor spill or from activation of the emergency shower, the disinfection system is equipped with a 370-gallon, vertical rectangular, polypropylene collection tank (T-01). This collection tank is designed to accept wastewater via a floor drain located in the BL3 laboratory. The tank has low and high level float switches (LS-L1L and LS L2H) for alarm and pump actuation. The low level switch (LS-L1L) also functions to protect the transfer pumps from running dry. Wastewater collected in tank T-01 is transferred via a set of two horizontal centrifugal pumps (P-01A and P-01B) to the treatment system for appropriate processing. The transfer pumps are controlled by the system central PLC and the two collection tank level sensors (LS-L1L and LS L2H). The collection tank wastewater is pumped at approximately 5-8 gpm to the receiving treatment tank (T-02 or T-03). Once the receiving treatment tank is full, the

transfer pump is shut-off. Since this is an emergency system, the transfer pumps are set to only pump to the treatment tanks every other treatment cycle to prevent both treatment tanks (T-02 and T-03) from filling. The transfer pumps are set for automatic alternation. The transfer pumps are also automatically set to shut-off at the liquid sensor low level. Both pumps are controlled via a Hand/Off/Auto switch at the system control panel. The high level liquid sensor in the collection tank triggers a high level alarm light and horn as well as trigger the common system alarm dry contacts. Attached drawing PFD-20-2D provides a flow diagram of the emergency wastewater collection mode.

Based on the aforementioned description of WWT system unit operations, we recommend scoring an additional 2 points for TUFTS' wastewater disinfection system. The points represent a hypochlorination unit and pumping operation. When added to the 3 or 4 points for pH adjustment operations from the previous Facility Grading Report submittal, the result is 5 or 6, which represents an overall grading level of 1-I for the wastewater treatment systems located in Building 20.

If you have any questions or require additional information, please call 508-970-0033 extension 34 for Seth Forden or extension 21 for Wayne Bates.

Very truly yours,

Capaccio Environmental Engineering, Inc.

BY:

Seth Forden

Environmental Engineer

Wayne E. Bates, Ph.D., P.E.

Manager, Engineering Group

Enclosures:

1) WWT Facility Grading Report

2) Batch Disinfection System WWT Process Flow Schematics

cc:

J. Chilton (TUFTS)

W. Bates (CAPACCIO)

MF (06-046)

Building 20 Disinfection System Addendum

MASSACHUSETTS BOARD OF CERTIFICATION OF WASTEWATER TREATMENT PLANT OPERATORS

FACILITY GRADING REPORT

Facility Name: Tufts Cummings School of Veterianary Med. File No.				
Street Address: 200 Westboro Road				
City/Town: North Grafton		State: MA		Zip: 01536
Telephone: 508-839-7921				
Contact Name and Title:	Joe Chilton, Fa	cilities Manager		
	Dis	scharge Permit Numb	ers	
NPDES No.				
Date Received:				
Rating Results:		Date:		Approved:
Industrial or Municipal: Industrial				
Rating Total: 2				
Grade: 1-I				

CLASS	<u>CUMULATIVE RATING VALUE</u>
Class (M or I)	1-7
Class 2 (M or I)	8-20
Class 3 (M or I)	21-30
Class 4 (M or I)	31-50
Class 5	51-65

RATING VALUES FOR CLASSIFICATI	ON OF FACILITIES	
UNIT	RATING	SCORE
Aeration mechanical or diffused air greater than 0.5 MGD less than 0.5 MGD		
Aeration: sludge, reaeration		
Aeration: pure oxygen greater than 0.5 MGD		
BOD Removal		
* BOD removal Rating = Design BOD in Pounds/Day X "f"		
"f" = 0.3 for primary treatment and 0.8 for secondary or higher facilities		
Carbon Filter .		
Carbon Reactivation		
Centrifuge		
Chemical Addition		
Chlorination pre, gas or liquid		
Chlorination post, gas or liquid		
Clarifier, tube setting or inclined plate		
Clariflocculation		
Coagulation and Neutralization		
Comminutation		
Condenser		
Cooling Tower		
Dechlorination		
Denitrification		
Dissolved Air Flotation		
Electrodialysis		
Equalization		
Evaporators		
Extended Aeration; greater than 0.1 MGD less than 0.5 MGD		

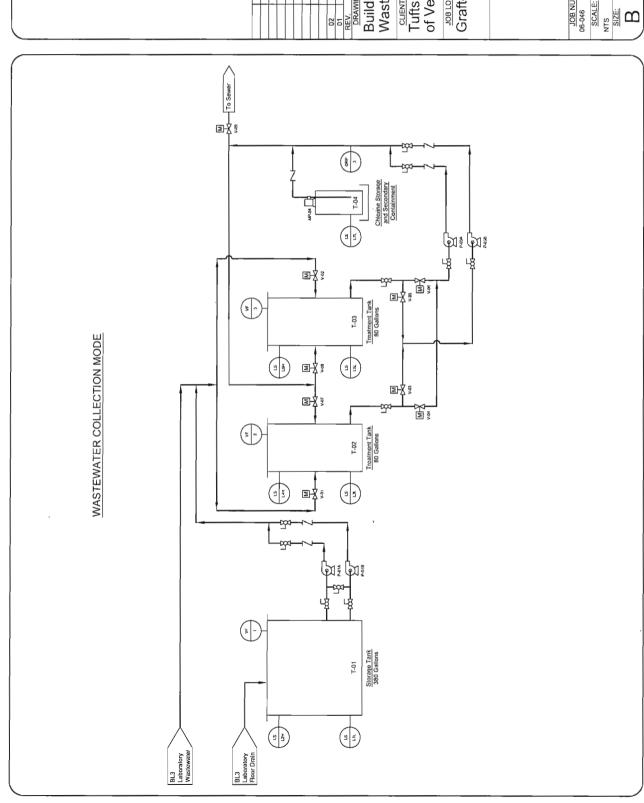
Extended Aeration equal to or less than 0.1 MGD		
Flash Mixing		
Flow measurement		
Flocculation		
Grit Chamber Aerated		
Grit Chamber manually cleaned		
Grit Chamber mechanical grit removal		
Heat Exchangers		
High rate filtration units less than 0.1 MGD greater than 0.1 less than 0.5 MGD greater than 0.5 less than 0.1 MGD greater than 1.0 MGD		
Hypochlorite generation		
Hypochlorination pre and/or post	1	1
Hydrocyclones (grit removal)		
Imhoff tanks		
Incineration		
Ion exchange		
Laboratory		
Land Irrigation, spraying		
Land Irrigation, direct discharge		
Membrane Filtration		
Nitrification		
Odor Control		
Oil Separation		
Oxidation Ditch		
Ozonatión		
pH Neutralization System		
Polishing Filter		
Post-aeration (cascade)		
Pre-aeration (mechanical)		
Primary Settling; airlift or manual sludge removal		
Primary Settling; mechanical sludge removal		
Primary Sludge holding and mixing		

.

Pumping (in plant)		
Pumping stations under operator's control	1	1
Reaction vessel		
Reverse Osmosis		
Rotating Biological Contactors		
Rotating Biological Contactors		
Rotary Drum Dryers		
Sand Filters; Multi media, automatic back wash		
Sand Filters; intermittent		
Sand Filters; polishing		
Sand Filters; subsurface		
Screens (mechanical)		
Scum Concentrator		
Secondary Settling; airlift or manual sludge removal		
Secondary Settling; mechanical sludge removal		
Septage facilities		
Sludge blending		
Sludge Composting		
Sludge drying Beds		
Sludge digestion; aerobic		·
Sludge digestion; heated and mixed anaerobic		
Sludge digestion; heated and unmixed, anaerobic		
Sludge digestion; unheated		
Sludge elutriation .		
Sludge incinerators		
Sludge press; belt		
Sludge press; plate and frame		
Sludge thickeners: floatation		
Stabilization ponds; non-aerated	t	
Stabilization ponds; aerated		
Stripping; air or steam		
Trickling Filters; high rate		
Trickling, Filters; staged		

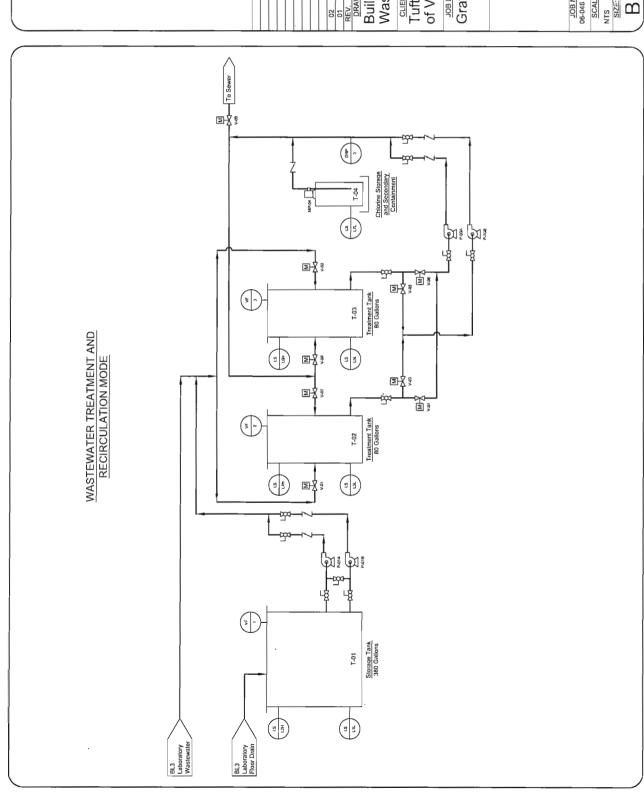
.

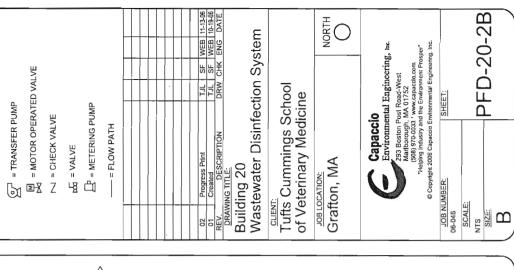
Trickling Fi	Iters; standard rate				
Ultraviolet	lisinfection				
Vacuum Fil	ter				
Wet Air Ox	idation				
Board Polic	y:	<u> </u>			
Board Polic	y:				
Comments:	The sum of the cumulative prepresents an addition to the	previous subm	includes only	the disinfection	system and
	•				



L#H = HIGH LEVEL ALARM L#L = LOW LEVEL ALARM

LEGEND



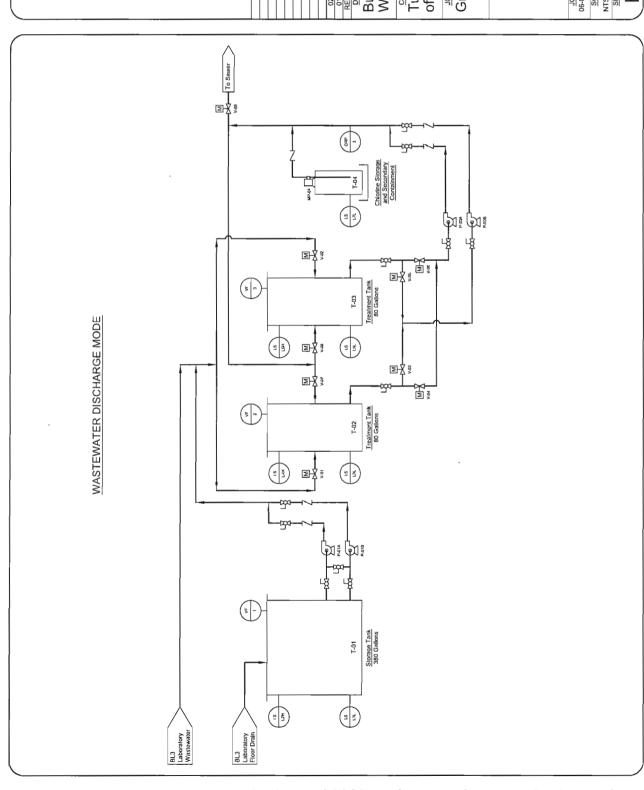


ORP = OXIDATION-REDUCTION POTENTIAL SENSOR

VF = VENT FILTER

L#H = HIGH LEVEL ALARM L#L = LOW LEVEL ALARM

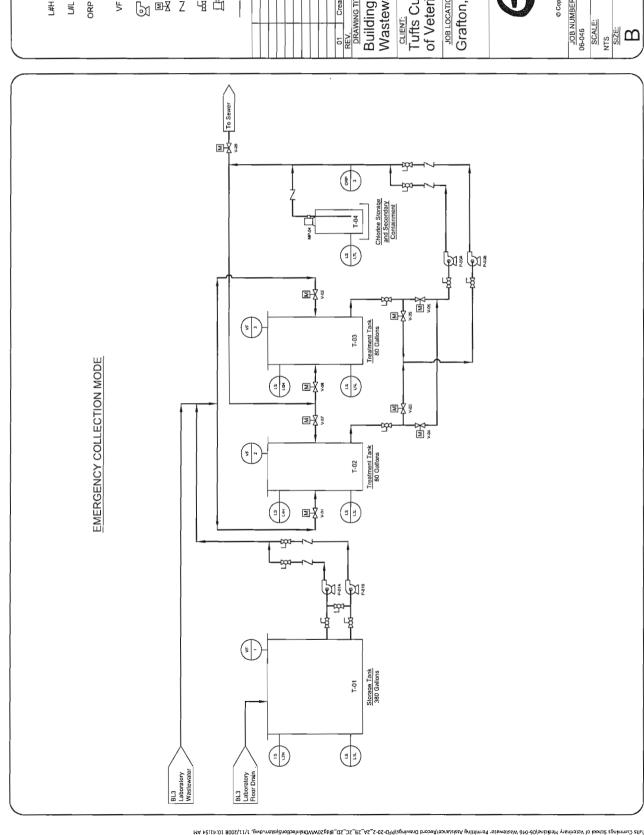
LEGEND



ORP = OXIDATION-REDUCTION POTENTIAL SENSOR

L#H = HIGH LEVEL ALARM L#L = LOW LEVEL ALARM

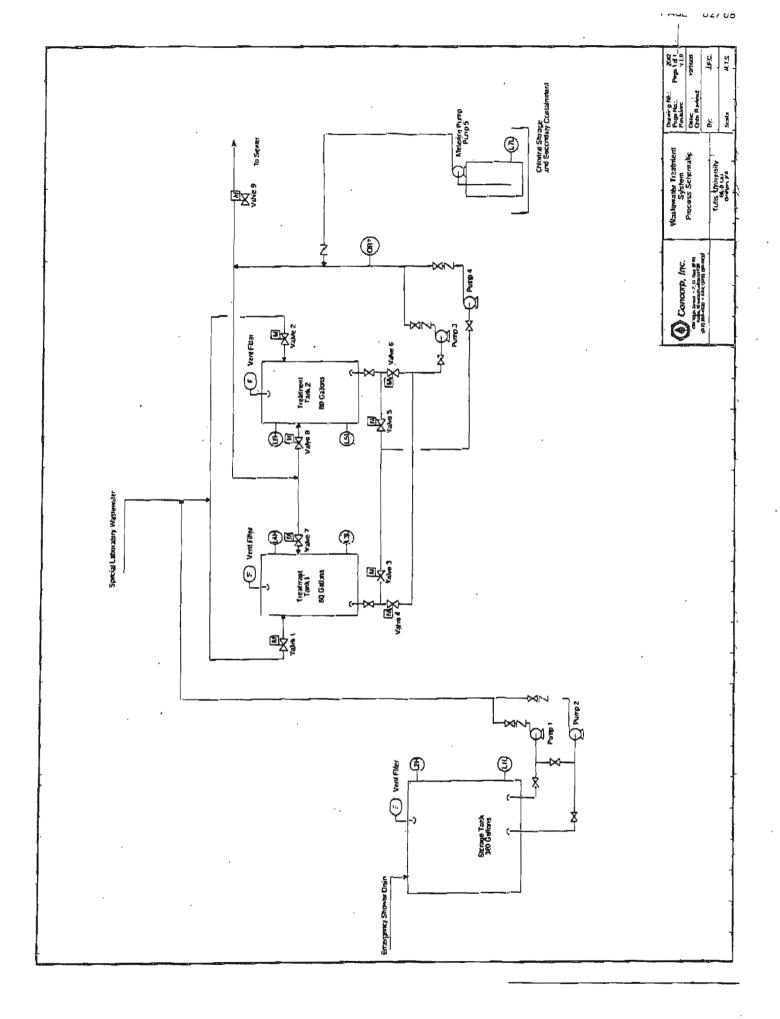
LEGEND



Attachment C-5 Building 20 – Disinfection System (IWPS – 1B)

Enclosed as Attachment C-5 is the following information as provided by the equipment manufacturer Concorp for the disinfection system IWPS-1B:

- o Process flow diagram
- o Description of system
- o Equipment List



Concorp Process System DCL-80/2-SP Batch Decontamination Process

Description of System and Operation

This system treats batches of laboratory wastewater with sodium hypochlorite to kill bacteria based organisms in the laboratory wastewater effluent. The system is designed as a batch type system where the wastewater is treated in one stage while the incoming wastewater is collected in the other stage. The system accepts material from selected laboratory sinks, via the laboratory wastewater polypropylene drain pipe system. The liquid is stored in the treatment tank until the the treatment tank is full and ready to process the wastewater. The typical holding capacity volume of material in each treatment tank is approximately 80 gallons. Once the tank liquid level reached a preset point, as indicated by a tank liquid level switch in the tank, the inlet motorized valve is automatically shut. Once the first tank is filled, the inlet motorized valve to the second tank is opened to start collection of the influent wastewater. The second treatment tank is designed to collect the wastewater while the wastewater is treated in the first treatment stage. Upon completion of the treatment cycle in the first tank and filling of the second treatment tank, the motorized valves automatically redirect the incoming wastewater to the first tank to allow the second treatment stage to process the batch collected wastewater. The system is designed for automatic collection and treatment of the laboratory wastewater based on this batch treatment cycle operation.

Based on treatment tank liquid level or collection residence time, the treatment cycle is started in the appropriate treatment tank. An ORP sensor is located in the process recirculation piping loop between the pump discharge and the return piping to the treatment tank. An injection port is located downstream from the sensor for chemical injection of the chemical reagent. The recirculation pump runs until the ORP setpoint is achieved and then maintained for a operator set period of time. The system-will add sodium hypochlorite (chlorine) to the collected laboratory wastewater to produce a solution ORP at the operator selected setpoint. When the desired concentration is achieved, the material is held for a minimum period of 60 minutes. During this time the wastewater is continuously being recirculated and the ORP measured with chemical feed as required to maintain the desired ORP setpoint. After this treatment stage period, the system can hold the material for operator testing or the system can be set for automatic discharge to the drain system.

The drain-down and discharge stage of the cycle is selectable as either operator initiated or automatic based on the above control system. Upon actuation, the control system opens an electrically actuated control valve to allow the recirculation/discharge pump to direct the contents of the treatment tank to the drain. When the control system is ready to reset the system for another treatment cycle, the electrically actuated valve will close automatically.

During the treatment cycle, the system will not accept additional material for treatment. The intake control valve is closed until the cycle has been completed, the tank is drained, and the drain valve has been closed. The system is designed so that the liquid is collected and then treated as a batch system. This is accomplished via two automatic motorized valves in the inlet suction piping from the treatment tanks to the recirculation/discharge-pumps. The system inlet piping motorized control

valves are actuated by the PLC based on the liquid high level switches located in each treatment tank. In the event both tanks are full, as indicated by the treatment tank high level sensors, an alarm light and hom will be trigger as well as the common system alarm dry contacts.

This wastewater in the treatment tank is recirculated for mixing, ORP sensing and chemical injection via a set of two horizontal centrifugal pumps to the the treatment system. These pumps are designed for approximately 25 gpm flowrate. The recirculation pumps are set for automatic alternation. The recirculation pumps are also automatically set to shut-off at the low level liquid sensor level. Both pumps will be controlled via a Hand/Off/Auto switch at the system control panel. The pumps are designed and piped for redundant operation so that either pump can service either treatment tank.

The system has a 370 gallon polypropylene vertical rectangular collection tank for the emergency shower drain system. This collection tank is designed to accept the wastewater via a gravity feed. The tank has low and high level float switches for alarm actuation. The low level switch also functions to protect the transfer pumps from running dry. The collected laboratory wastewater is transferred via a set of two horizontal centrifugal pumps to the treatment system for appropriate processing. The transfer pumps are controlled by the system central PLC and the two collection tank level sensors. The collection tank wastewater is pumped at approximately 5-8 gpm via a transfer pump to the receiving treatment tank. Once the receiving treatment tank is full the transfer pump is shut-off. Since this is an emergency system, the transfer pumps are set to only pump to the treatment tanks every other treatment cycle to prevent filling both treatment tanks so that no other process wastewater can by collected. The transfer pumps are set for automatic alternation. The transfer pumps are also automatically set to shut-off at the low level liquid sensor level. Both pumps will be controlled via a Hand/Off/Auto switch at the system control panel. The high level liquid sensor in the collection tank will trigger a high level alarm light and horn as well as trigger the common system alarm dry contacts.

Tufts University Veterinary Medicine, Grafton, Bldg 20 Grafton, Massachusetts

Batch Decontamination Process System

Equipment List

Duantity	Equipment Description
1	Collection Tank, vertical rectangular closed top, polypropylene, 370 gallon nominal capacity, 34" x 38" x 66"h, with epoxy coated steel stand
2	Treatment Tank, totalized enclosed, molded polyethylene, 80 gallon nominal capacity, 34" dia x 44"h, with epoxy coated steel stand
2	Inlet Control Valves, 3" polypropylene, with electric actuator
3	Pump Discharge Valves, 1" polypropylene, with electric actuator
4	Pump Suction Valves, 1-1/2" polypropylene, with electric actuator
1	Sodium Hypochlorite Metering Pump (5 gph capacity), with tubing, foot valve, injection-valve and polypropylene wall mounting shelf
1	Chemical Containment Tank, 30 gallon, for secondary containment of chemical drum
1	ORP Process Controller, panel mounted ORP analyzer/controller
Ī	ORP Sensor, piping mounting assembly and cable
2	Transfer Pump, magnetic drive, 1/4 HP, GFRPP construction Little Giant Model TE-4-MD-HC, rated at 8 gpm @ 15' THD
2	Recirculation Pump, magnetic drive, 1/3 HP, GFRPP construction Little Giant Model TE-5.5-MD-HC, rated at 28 gpm @ 15 TDH
4	Sets of pump inlet ball valves, outlet ball and ball check valves
3	Sets of tank 0.2 micron sterile filter elements and mounting manifold for collection tank and treatment tank chamber vents
1	System Skid, 34" x 96" epoxy coated steel skid for treatment tanks and pumps

Tufts University Veterinary Medicine, Grafton, Bldg 20 Grafton, Massachusetts

Batch Decontamination Process System

Equipment Description

Equipment List (Continued)

Quantity

1 Control Panel, NEMA 4 rated, fully wired and pre-tested, with the following equipment: Programmable Logic Controller (PLC).

- PLC interface for operator inputs
- system On/Off switch
- transfer pumps Hand/On/Off switches
- recirculation pumps Hand/On/Off switches
- · transfer pump pump control circuits
- recirculation/discharge pump control circuits
- · metering pump control circuit
- alarm horn with alarm silence and reset buttons
- alarm and annunciation section to show the following conditions:
 - System On
 - Recirculation Pump 1 On
 - Transfer Pump 1 On
 - Treatment Tank 1 Active
 - Treatment Tank | Filled
 - Treatment Tank 2 Filled
 - · Treatment Tank I Discharging

 - Pump motor starter tripped alarm
 - ORP Meter Alarm
 - Collection Tank Low Water Alarm
 - Collection Tank High Water Alarm
 - System General Alarm

- Recirculation Pump 2 On
- Transfer Pump 2 On
- Treatment Tank 2 Active
- Treatment Tank 1 Operating
- Treatment Tank 2 Operating
- Treatment Tank 2 Discharging